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SITE AUDIT

OF

THE MONADNOCK COMPANY
AT 18301 EAST ARENTH AVENUE
CITY OF INDUSTRY, CALIFORNIA

FEBRUARY 28, 1990



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FEBRUARY 28, 1990

PREPARED FOR:

TRW INCORPORATED



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### SECTION I

### INTRODUCTION

McLaren was retained by TRW Incorporated to perform an environmental audit of the site currently occupied by the Monadnock Company at 18301 East Arenth Avenue, in the City of Industry, California. The audit is in partial fulfillment of the requirements of the Amended Cleanup and Abatement Order Number 88-057 issued by the Regional Water Quality Control Board, Los Angeles Region (RWQCB) September 29, 1989. The purpose of the audit was to identify past and current usage, handling, storing and disposal of chemicals, with regard to potential contamination sources.

The audit consisted of the following tasks:

### Site Inspection

An environmental site inspection was performed on the subject property to determine the presence of any hazardous materials on the property or the potential for contamination of soil and groundwater from activities conducted on the property.

### Historical Research

Historical property uses were identified and evaluated to determine present environmental impacts. The property history was ascertained via personnel interviews, review of aerial photographs, and review of City of Industry Building Department records.

# Agency Research

McLaren researched and evaluated agency file data for the subject site. Sites listed on State or Federal hazardous site lists within one-half mile of the subject site were also identified. The goal of this task was to obtain information regarding past or present hazardous materials use, storage, and disposal practices.

# Adjacent Properties Review

An evaluation of the adjacent facilities within one-half mile of the subject property was performed to note any off-site facilities which have a potential for releasing hazardous materials to the soil or the groundwater near the subject site.

This report presents findings from each of these tasks. Sections II through V present the results of the site inspection, the site history, the agency research, and the review of the adjacent properties. Section VI provides a summary of the environmental audit.

# Background

The Monadnock Company is located within an area of light industry. Figure 1 shows the site and the surrounding vicinity. The subject site consists of two parcels of land; one undeveloped, the other containing a single building with surrounding paved areas. The facility has been used for the manufacture of small parts and fasteners for the aerospace industry since 1966. Industrial processes, potentially generating hazardous wastes such as degreasing, heat treating, and metal plating, have been employed.

According to information from the RWQCB, the Los Angeles County Department of Public Works, and interviews with past employees, the first development on the site occurred in 1963. The manufacturing facility was called Academy Ribbon Mill. Cotton ribbon was dyed, packaged, and sold. Glue, dye, and the rinsate from mixing pots were washed down into a floor sink then to the industrial waste sewer which drained to a trap. The flow rate was approximately 1,000 gallons per day.

In December, 1965, the facility became the Cinch-Monadnock Company. The Cinch-Monadnock Company, a division of United Carr, had relocated from Hayward, California. Modifications were made to the building, previously occupied by the Academy Ribbon Mill, which included the installation of a clarifier and associated piping on the west side of the building, the addition of a plating room, and the addition of a compressor room.

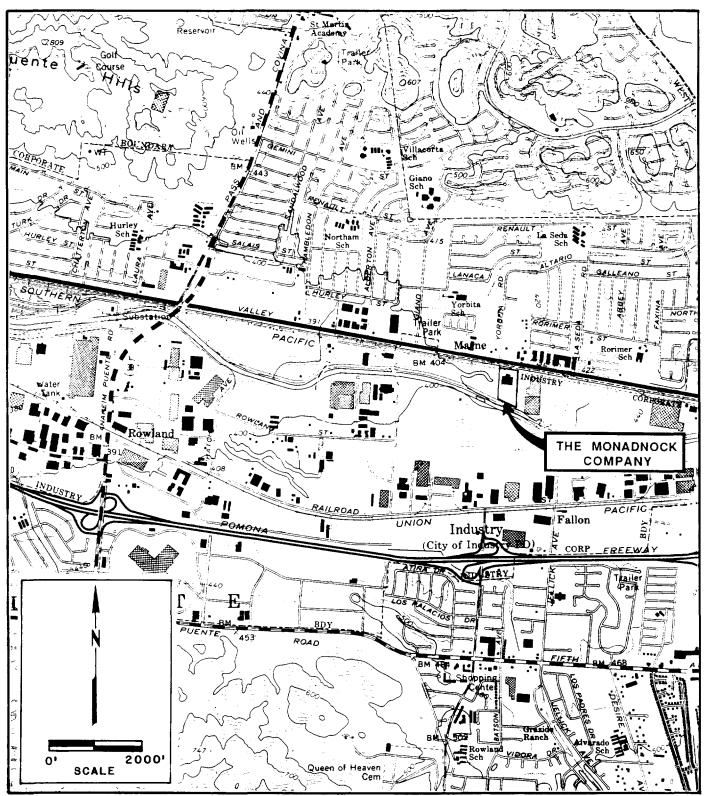
The Cinch-Monadnock Company manufactured clamps, washers, and heat sinks for industries including automotive, aircraft, appliance, and electronics. Parts were manufactured from metals, including copper, and processes included metal stamping, degreasing, heat treating, and plating. Chlorinated solvents were used as the degreasing agents.

Mr. Jim Daunt, a former facilities engineer interviewed during this audit, began working at the site in 1966. Mr. Charles Miller, the former facilities manager and current land owner, began working at the site in 1967.

United Carr merged with TRW in 1969-1970 and became TRW/Cinch-Monadnock. By 1971, TRW/Cinch-Monadnock had decreased the use of chlorinated solvents due to the phase out of its copper-based product line. There was a short resurgence in solvent use during 1975-1976, although exact quantities are unknown.

TRW continued to operate the plant until October, 1980, when it was sold to Mr. Miller and became known as the Monadnock Company. In 1981, the Monadnock Company added a sampling pit to the existing clarifier in order to comply with a request from the Los Angeles County Sanitation District. Floor drains along the west dock and plumbing in the plating room were abandoned and plugged at this time.

In October, 1987, the Monadnock Company sold its operating assets to HCH Acquisition Corporation. HCH Acquisition changed its name to the



REFERENCE: U.S.G.S. 7.5' TOPOGRAPHIC QUADRANGLES: BALDWIN PARK, LA HABRA



Monadnock Company and the former Monadnock Company became known as C.M. Miller Enterprises, Inc.

The current Monadnock Company continues to use plating and heat treatment in its operations. It allegedly used solvents until August, 1988; soap and water are currently used as degreasing agents.

### Previous Environmental Studies

Soil and groundwater studies at the Monadnock site have been conducted under the supervision of several consultants. In 1986, Dames and Moore conducted an environmental assessment and a limited soil and groundwater investigation in response to a request from Mr. Charles Miller, the current owner of the Monadnock site. The purpose of the assessment and investigation was to provide information concerning potential hazardous waste contamination of the site prior to a proposed property transaction between Mr. Miller and B. F. Goodrich Company. As part of the investigation, Dames and Moore collected soil samples from six soil borings and three surface samples. In addition, three groundwater monitoring wells were installed, MW-1, MW-2, and MW-3. Figure 2 shows the locations of the soil borings, surface samples, and the monitoring wells.

Table 1 summarizes the results of the soil sampling data obtained by Dames and Moore. Contaminants analyzed were total petroleum hydrocarbon (TPH); volatile organic compounds (VOC) including trichloroethylene (TCE), tetrachloroethylene (PCE), 1,1,1-trichloroethane (1,1,1-TCA), 1,1,2trichloroethane (1,1,2-TCA); inorganic compounds including cadmium, lead, zinc and cyanide; and chlorinated organic pesticides. TPH was analyzed in samples from four soil borings and one surface sample. results from soil boring B-6 (at 3 feet) and the surface sample S-1, both located near the old drum storage area, had significant concentrations of TPH; 4560 ppm and 3460 ppm, respectively. VOCs were analyzed in the 3foot and the 10-foot sample from B-6. Significant concentrations of VOCs were found at 3 feet including PCE at 590 ppm, TCE at 1.8 ppm, and 1,1,1-TCA at 12 ppm. Inorganics were analyzed in 5 soil borings and one surface Elevated levels of cadmium and zinc were found in the surface sample S-2. Based on the contaminant levels reported, Dames and Moore recommended the excavation and removal of the soil in selected areas, as well as additional investigation.

The groundwater quality results obtained by Dames and Moore (1986) are presented in Table 2. The data indicated elevated concentrations of VOCs in the shallow aquifer immediately downgradient (MW-2) of the Monadnock facility. Contaminants including TCE, PCE, and 1,1,1-TCA were found in concentrations exceeding the California Department of Health Services Action Levels. Groundwater contained PCE to 960  $\mu \rm g/l$  (ppb), TCE to 1,000 ppb, and 1,1,1-TCA to 530 ppb. Action levels for these compounds in groundwater are 4, 5, and 200 ppb, respectively.

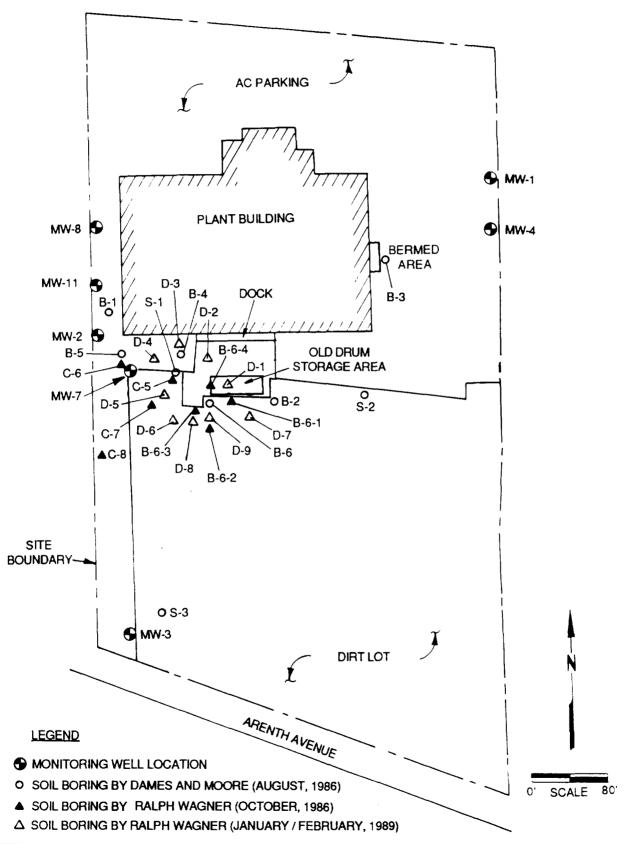




Table 1
Analytical Results of Soil Samples Collected by Previous Consultants (ppm)

Source	Sample <u>Location</u>	ICE	Volatile Or PCE	ganic Compounds	<u>1,1,2-TCA</u>	<u>cd</u>	Metals Pb	<u>Zn</u>	Cyanide	<u>Pesticides</u>	<u>TPH</u>
Dames & Moore (1986)	B-1 composite from 1-,5-,and 10- foot depth	NA	NA	NA	NA	0.4	1.8	23	0.32	NA	NA
	B-2 composite from 1-,5-,and 10- foot depth	NA	NA	NA	NA	0.8	2.2	25	0.88	NA	NA
	B-3 sample collect from 1-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.0
	B-4 sample collect from 1-foot depth	NA	NA	NA	NA	NA	<b>NA</b> .	NA	NA	NA	20
	B-4 composite from 1-,5-,and 10- foot depth	NA	NA	NA	NA	0.4	1.6	20	0.1	NA	NA
	B-5 sample collect from 1-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	7.0
	B-5 composite from 1-,5-,and 10- foot depth	NA	NA	NA	NA	0.3	1.6	18	<0.1	NA	NA
	B-6 sample collected from 3-foot depth	1.8	590	12	0.6	NA	NA	NA	NA	NA	4650

Table 1 (cont')
Analytical Results of Soil Samples Collected by Previous Consultants (ppm)

Source	Sample Location	<u>Vo</u> <u>TCE</u>	latile Org	anic Compounds	1,1,2-TCA	<u>Cd</u>	Metals Pb	<u>Zn</u>	<u>Cyanide</u>	<u>Pesticides</u>	<u>TPH</u>
		<u> </u>	_	<u></u>			_	_			
Dames & Moore (1986)	B-6 composite from 3-,5-,and 10- foot depth	NA	NA	NA	NA	2.3	1.8	23	0.66	NA	NA
	B-6 sample collected from 10-foot depth	<0.007	0.31	0.062	<0.007	NA	NA	NA	NA	NA	NA
	S-1	N.A.	MA	NA	NA.	11.5	NA		NA	NA	3460
	surface	NA	NA	NA	NA	NA	NA	NA	NA	NA	3400
	s-2										
	surface	NA	NA	NA	NA	304	31	1850	75	NA	NA
	S-3		114	NA	N.A	MA	NA	NA	NA	ND	NA
	surface	NA	NA	NA	NA	NA	NA	NA	NA	NU	NA
Ralph Wagner	B-6-1						•				
(1986)	5-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	10-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	15-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	20-foot depth	0.250	0.006	0.005	NA	NA	NA	NA	NA	NA	NA
	B-6-2										
	5-foot depth	0.009	0.073	0.084	NA	NA	NA	NA	NA	NA	NA
	10-foot depth	0.016	0.150	0.438	NA	NA	NA	NA	NA	NA	NA
	15-foot depth	0.005	0.007	0.005	NA	NA	NA	NA	NA	NA	NA
	20-foot depth	0.011	0.012	0.004	NA	NA	NA	NA	NA	NA	NA
	B-6-3										
	5-foot depth	0.018	3.510	0.005	NA	NA	NA	NA	NA	NA	NA
	10-foot depth	0.006	2.480	0.005	NA NA	NA.	NA NA	NA NA	NA NA	NA NA	NA.
	15-foot depth	0.005	0.930	0.005	NA NA	NA NA	NA NA	NA	NA NA	NA NA	NA
	20-foot depth	0.005	0.005	0.005	NA NA	NA.	NA.	NA.	NA NA	NA	NA NA
	· · · · · · · · · · · · · · · · · ·									••••	

Table 1 (cont<sup>1</sup>)

Analytical Results of Soil Samples Collected by Previous Consultants (ppm)

	Sample	Vo	olatile Org	anic Compounds			Metals		Cyanide	<u>Pesticides</u>	TPH
<u>Source</u>	Location	TCE	<u>PCE</u>	1,1,1-TCA	1,1,2-TCA	<u>Cd</u>	Pb	<u>Zn</u>		,,	
Ralph Wagner	B-6-4										
(1986)	5-foot depth	0.005	0.080	0.005	NA	NA	NA	NA	NA	NA	NA
	10-foot depth	0.005	0.146	0.006	NA	NA	NA	NA	NA	NA	NA
	15-foot depth	0.005	0.620	0.005	NA	NA	NA	NA	NA	NA	NA
	20-foot depth	4.650	0.021	1.190	NA	NA	NA	NA	NA	NA	NA
	c-5										
	5-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	10-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	15-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	20-foot depth	0.100	0.104	0.050	NA	NA	NA	NA	NA	NA	NA
	30-foot depth	0.005	0.021	0.005	NA	NA	NA	NA	NA	NA	NA
	35-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	40-foot depth	0.005	0.018	0.005	NA	NA	NA	NA	NA	NA	NA
	C-6						•				
	5-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	10-foot depth	0.005	0.017	0.005	NA	NA	NA	NA	NA	NA	NA
	15-foot depth	0.005	0.009	0.005	NA	NA	NA	NA	NA	NA	NA
	20-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	25-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	30-foot depth	0.044	0.095	0.008	NA	NA	NA	NA	NA	NA	NA
	35-foot depth	0.112	0.240	0.033	NA	NA	NA	NA	NA	NA	NA
	40-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA

Table 1 (cont')
Analytical Results of Soil Samples Collected by Previous Consultants (ppm)

	Sample	Vo	olatile Org	anic Compounds			Metals		Cyanide	<u>Pesticides</u>	<u>TPH</u>
Source	Location	TCE	PCE	1,1,1-TCA	1,1,2-TCA	<u>Cd</u>	Pb	<u>Zn</u>			
Ralph Wagner	C-7										
(1986)	5-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	10-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	15-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	20-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	25-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	30-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	35-foot depth	0.270	0.080	0.005	NA	NA	NA	NA	NA	NA	NA
	40-foot depth	0.014	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	45-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	50-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	C-8										
	5-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	10-foot depth	0.005	0.005	0.005	NA	NA	. NA	NA	NA	NA	NA
	15-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	20-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	25-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	30-foot depth	0.037	0.010	0.005	NA	NA	NA	NA	NA	NA	NA
	35-foot depth	0.036	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	40-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	45-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
	50-foot depth	0.005	0.005	0.005	NA	NA	NA	NA	NA	NA	NA
Ralph Wagner	D-1										
(1989)	5-foot depth	ND	0.017	ND	ND	NA	NA	NA	NA	NA	NA
• • • • • • • • • • • • • • • • • • • •	10-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	15-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	20-foot depth	ND	0.008	ND	ND	NA	NA	NA	NA	NA	NA
	25-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	30-foot depth	NA	NA	NA.	NA	NA	NA	NA	NA	NA	NA
	35-foot depth	NA	NA	NA.	NA	NA	NA	NA	NA	NA	NA
	40-foot depth	0.021	0.083	ND	ND	NA	NA	NA	NA	NA	NA

Table 1 (cont')
Analytical Results of Soil Samples Collected by Previous Consultants (ppm)

	Sample	Vo	olatile Org	janic Compounds			Metals		Cyanide	<u>Pesticides</u>	<u>TPH</u>
Source	Location	<u>TCE</u>	PCE	1,1,1-TCA	1,1,2-TCA	<u>Cd</u>	<u>Pb</u>	<u>Zn</u>			
Ralph	D-2										
Wagner											
(1989)	5-foot depth	ND	0.013	ND	ND	NA	NA	NA	NA	NA	NA
	10-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	15-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	20-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	25-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	30-foot depth	0.075	0.057	ND	ND	NA	NA	NA	NA	NA	NA
	35-foot depth	0.286	0.048	ND	ND	NA	NA	NA	NA	NA	NA
	D-3										
	5-foot depth	ND	0.008	ND	ND	NA	NA	NA	NA	NA	NA
	10-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	15-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	20-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	25-foot depth	NA	NA	NA	NA	NA	. NA	NA	NA	NA	NA
	30-foot depth	0.042	0.058	0.005	ND	NA	NA	NA	NA	NA	NA
	35-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	D-4										
	5-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	10-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	15-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	20-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	25-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	30-foot depth	0.030	0.035	0.008	ND	NA	NA	NA	NA	NA	NA
	35-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Table 1 (cont')
Analytical Results of Soil Samples Collected by Previous Consultants (ppm)

	Sample			anic Compounds			Metals		Cyanide	<u>Pesticides</u>	<u>TPH</u>
Source	<u>Location</u>	<u>TCE</u>	PCE	1,1,1-TCA	1,1,2-TCA	<u>Cd</u>	Pb	<u>Zn</u>			
Ralph Wagner	D-5										
(1989)	5-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	10-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	15-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	20-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	25-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	30-foot depth	0.007	0.014	ND	ND	NA	NA	NA	NA	NA	NA
	35-foot depth	0.320	0.048	ND	ND	NA	NA	NA	NA	NA	NA
	40-foot depth	0.551	0.058	ND	ND	NA	NA	NA	NA	NA	NA
	D-6										
	5-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	10-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	15-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	20-foot depth	NA	NA	NA	NA	NA	. NA	NA	NA	NA	NA
	25-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	30-foot depth	0.125	0.084	ND	ND	NA	NA	NA	NA	NA	NA
	35-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	40-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	45-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	D-7										
	5-foot depth	ND	0.006	ND	ND	NA	NA	NA	NA	NA	NA
	10-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	15-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	20-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	27-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	30-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	35-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA

Table 1 (cont')
Analytical Results of Soil Samples Collected by Previous Consultants (ppm)

Source	Sample Location	<u>V</u> <u>TCE</u>	olatile Org	anic Compounds	1,1,2-TCA	<u>Cd</u>	Metals Pb	<u>Zn</u>	Cyanide	<u>Pesticides</u>	<u>TPH</u>
3001 CE	Location		FUL	1,1,1 100	I, I, E TON	<u> </u>	<u> </u>				
Ralph	D-8										
Wagner											
(1989)	5-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	10-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	15-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	20-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	D-9										
	5-foot depth	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA
	10-foot depth	ND	0.008	ND	ND	NA	NA	NA	NA	NA	NA
	15-foot depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	20-foot depth	ND	0.007	ND	ND	NA	NA	NA	NA	NA	NA

Table 2
Summary of Groundwater Quality Monitoring Results at the Monadnock Site (ppb)

# Sampling Date

Well #	Chemicals	<u>7/86</u>	<u>9/86</u>	11/86	2/87	<u>3/87</u>	<u>9/87</u>	<u>2/88</u>	1/89	6/89	1/90
MW-1	TCE	<25	NA	NA	NA	NA	NA	NA	ND	ND	ND
	PCE	<25	NA	NA	NA	NA	NA	NA	ND	ND	1.3
	TCA	<25	NA	NA	NA	NA	NA	NA	ND	ND	ND
	1,1 DCE	NA	NA	NA	NA	NA	NA	NA	NA	ND	ND
MW-2	TCE	710	560	710	620	NA	182	102	120	270	460
	PCE	310	600	770	190	NA	102	78	70	320	410
	TCA	380	180	350	77	NA	12	25	ND	ND	7
	1,1 DCE	NA	NA	NA	NA	NA	NA	NA	NA	180	840
MW-3	TCE	<5	NA	4	NA	NA	NA	2.6	ND	2	2
	PCE	<5	NA	100	NA	NA	NA	6.2	ND	6	ND
	TCA	<5	NA	6	NA	NA	NA	2	ND	1	ND
	1,1 DCE	NA	NA	NA	NA	NA	NA	NA	NA	ND	ND
MW-4	TCE	NA	NA	NA	NA	1.0	NA	NA	NA	NA	ND
	PCE	NA	NA	NA	NA	1.6	NA .	NA	NA	NA	1.9
	TCA	NA	NA	NA	NA	0.5	NA	NA	NA	NA	ND
	1,1 DCE	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
MW-7	TCE	NA	NA	NA	NA	456	200	152	200	66	400
	PCE	NA	NA	NA	NA	81	93	74	150	60	160
	TCA	NA	NA	NA	NA	48	56	8.2	ND	50	1.6
	1,1 DCE	NA	NA	NA	NA	NA	NA	NA	NA	42	440
MW-8	TCE	NA	NA	NA	NA	180	47	NA	90	400	160
	PCE	NA	NA	NA	NA	110	27	NA	80	320	56
	TCA	NA	NA	NA	NA	32	3	NA	ND	30	ND
	1,1 DCE	NA	NA	NA	NA	NA	NA	NA	NA	180	100
MW-11	TCE	NA	NA	NA	NA	NA	NA	26	20	270	80
	PCE	NA	NA	NA	NA	NA	NA	ND	200	10	5.5
	TCA	NA	NA	NA	NA	NA	NA	ND	ND	ND	ND
	1,1 DCE	NA	NA	NA	NA	NA	NA	NA	NA	50	231
A-1	TCE	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	PCE	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	TCA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	1,1 DCE	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND

NA: Not analyzed.

ND: Chemicals non-detected.

As a result of the findings by Dames and Moore, the RWQCB ordered Mr. Miller to submit a plan for further investigation of the soil and groundwater contamination. Mr. Miller authorized Mr. Ralph Wagner, a private consultant, to prepare the plan. Mr. Wagner supervised the collection of soil samples from the locations as shown on Figure 2. Eight soil borings were completed and sampled for volatile organic compounds. Significant levels of volatiles were found in B-6-3, B-6-4, and C-6. The samples from B-6-3 and B-6-4 were near the old drum storage area. The sample from C-6 was near the area described by Mr. Miller as the old swamp.

In March of 1987, Brown and Caldwell installed three monitoring wells, BC-2 (MW-4), BC-5 (MW-7) and BC-3 (MW-8) shown on Figure 2. The results of groundwater sampling from these wells are presented in Table 2. MW-4 is on the upgradient boundary of the property and was found to have very low levels of VOCs. MW-7 is located in the former swamp area and near soil sample C-6. It was found to have significant levels of volatiles, especially TCE, in the groundwater. MW-8 is located on the northwest side of the plant building and was found to contain significant levels of volatiles, especially TCE and PCE, in the groundwater.

During 1987, contaminated soil was excavated from the old drum storage area at the back of the plant building. The excavation was not completed to the satisfaction of the RWQCB; backfill and closure was not completed.

Mr. Wagner, in 1987, collected surface water samples from San Jose Creek, located south of Arenth Avenue. The samples were collected from upstream and downstream of the Monadnock facility. The water samples were analyzed for VOCs; none were detected upstream of the facility, but elevated concentrations were detected in water samples collected at 500-foot intervals for a distance of 5,000 feet downstream of the facility. The downstream water data is not definitive in indicating that Monadnock is the source contributor of the solvent concentrations, especially since a sample was not collected at the closest point downstream from the Monadnock Company, due to an insufficient supply of surface water.

In January 1988, Falcon Environmental removed a 1,000 gallon underground gasoline storage tank which had been located at the southeast corner of Monadnock's parking lot. The tank had been in place since 1967. Soil samples, collected by Falcon and analyzed by Geotest, did not indicate the presence of hazardous amounts of petroleum hydrocarbons in soil underlying the tank.

MW-11 was installed in February of 1988, by Mr. Wagner. His report dated June 27, 1988 documents the construction of this well, but is not available from the RWQCB. In Item 13 of the Amended Cleanup and Abatement Order No. 88-057 issued on September 29, 1989, the RWQCB states that the deep monitoring well constructed in February 1988, with the subsequent report dated June 1988, partially fulfilled several of the requirements

of the original Cleanup and Abatement Order 88-057 issued on May 12, 1988, which required a technical report addressing:

- 1) the aquifer characteristics of the uppermost saturated zone;
- 2) hydraulic connectivity existing between saturated units; and
- 3) delineation of vertical extent of on-site contamination to include any underlying saturated zone(s).

The RWQCB requested Mr. Miller to supply plans to complete the soil excavation and verification of clean conditions at the old drum storage area. The major concern expressed by the RWQCB was that rain water and runoff was readily infiltrating the excavation and potentially contaminating groundwater. Mr. Wagner submitted a revised workplan for a comprehensive assessment of the contamination which was reviewed and determined unacceptable to the Water Board.

Further delineation of the extent of the contamination at the excavation of the old drum storage area was submitted in February 1989. Nine soil borings around the excavation were drilled under the direction of Mr. Ralph Wagner and samples taken for analysis of VOCs. Contamination in excess of 200 ppb was found in two borings in soil below the water table at about thirty feet. Additionally, monitor wells 1, 2, 3, 4, 7, 8, and 11 were sampled and analyzed for VOCs. Contaminants were not detected in MW-1 and MW-3. Contaminants in MW-2 included TCE at 120 ppb and PCE at 70 ppb, TCA was not detected. Contaminants in MW-7 included TCE at 200 ppb and PCE at 150 ppb, TCA was not detected. Contaminants in MW-8 included TCE at 90 ppb and PCE at 80 ppb, TCA was not detected. Contaminants in MW-11 included TCE at 20 ppb, PCE at 200 ppb, and TCA was not detected.

In April 1989, verification sampling of the excavation was performed. GeoResearch collected soil samples from the excavation under the old drum storage area south of the Monadnock building to verify clean conditions at the limits of the excavation. Soil identified as clean, remained stored on site in drums and in stockpiles.

Mr. Wagner, on behalf of Mr. Miller, submitted a closure plan to backfill the excavation of the old drum storage area on August 15, 1989. The plan was approved by the RWQCB. Prior to backfilling the excavation with soil from onsite, the potential backfill material was tested by McLaren on behalf of TRW. The material was determined to be satisfactory for backfilling. Backfilling and closure of the excavation was carried out under the supervision of Mr. Wagner and Mr. Miller, observed by McLaren, TRW, and the RWQCB. Closure was completed in December 1989.

In January 1990, McLaren conducted water sampling of all monitoring wells and of one 11-inch diameter abandoned well located in the vacant lot south of the Monadnock facility. The results indicated that VOC's were not detected in water from the abandoned well, A-1, but were detected in wells

located downgradient of the Monadnock Building. The water quality results from this sampling round are included on Table 2 and are shown on Figure 3. All the wells were sounded and surveyed in conjunction with this last sampling round and relative groundwater elevations were calculated and are presented in Table 3. Figure 4 presents the groundwater elevation contours for the site. Data indicates that the groundwater flow direction is westerly at a gradient of 0.0065 ft/ft. Data from MW-11 was not used to contour groundwater and calculate the gradient since the well is screened over two intervals. Well A-1 was destroyed in compliance with state and county regulations during February, 1990.

# Hydrogeologic Setting

The Monadnock site is located within the Puente Groundwater Basin which is a relatively narrow alluvial basin situated between the San Jose Hills on the north and the Puente Hills on the south. The west end of the Puente Basin opens into the San Gabriel Basin, to which it contributes an average of 850 acre-feet/year of groundwater. Surface water flows in the San Jose Creek westward into the Puente Basin from the Pomona area. The basin covers approximately 10,900 acres. The Puente Basin and the San Gabriel Basin have been designated a Superfund site by the EPA.

The fluvial sediments in the Puente Basin are composed of gravel, sand, silt, and clay. The fluvial sediments are potentially from the Puente and San Jose Hills. Additional sediment sources are from the erosion of the San Gabriel Mountains, from where the sediment is transported and deposited by the San Jose Creek. Total sediment thickness varies from about 100 feet in the eastern portion of the basin to about 450 feet where the basin joins the San Gabriel Valley. The coarser grained channel-fill deposits of sand and gravel are the main permeable units which form the aquifers of the basin.

Depth to groundwater ranges from 30 to 40 feet below grade and regional groundwater flow and local groundwater flow is from east to west. The gradient of flow at the site is 0.0065 ft/ft. Well logs and soil boring logs indicate that the site is underlain by approximately 10 to 15 feet of silty sand, 20 feet of gravelly sand, and 15 feet of saturated clay and/or silt, which is underlain by saturated gravel. No municipal drinking water wells are located within 5 miles downgradient of the site.

FIGURE 3
DISTRIBUTION OF VOLATILE ORGANIC
COMPOUNDS IN GROUNDWATER (PPB)
THE MONADNOCK COMPANY
JANUARY, 1990

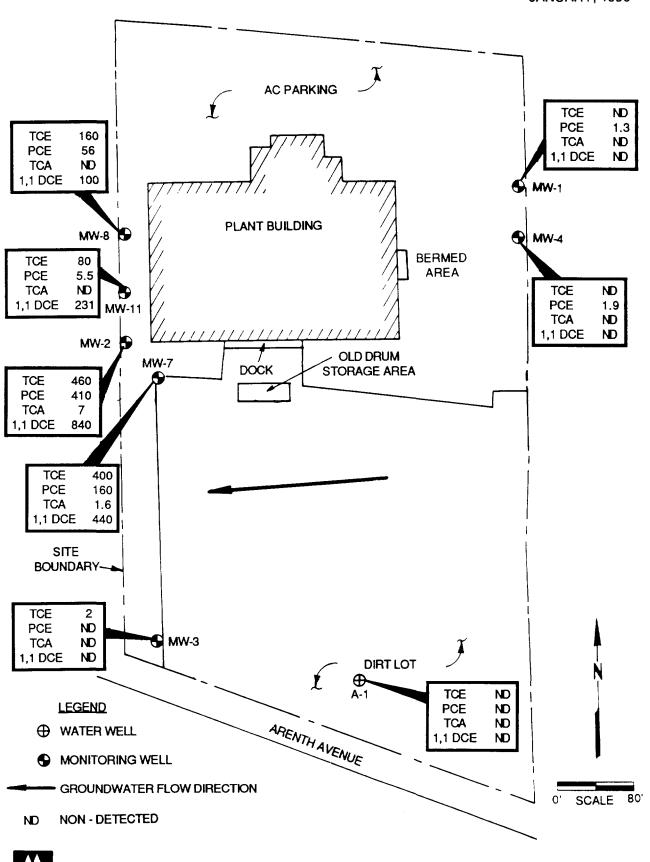


Table 3

Groundwater Elevations in Monitoring Wells at the Monadnock Site

Well #	Total Depth	Screen Interval	Top of Casing*	Depth to Water**	Groundwater Elevation
MW-1	50'	30'-50'	99.951	33.941	66.011
MW-2	521	251-451	94.81'	31.441	63.37'
MW-3	471	251-451	92.501	29.001	63.50
MW-4	621	20'-60'	99.741	33.921	65.821
MW-7	601	251-551	94.931	31.681	63.251
8-WM	601	251-551	95.831	32.491	63.341
MW-11	90' <sup>a</sup>	NA	95.751	33.161	62.59'
A-1	60,	NA	95.651	31.121	64.531

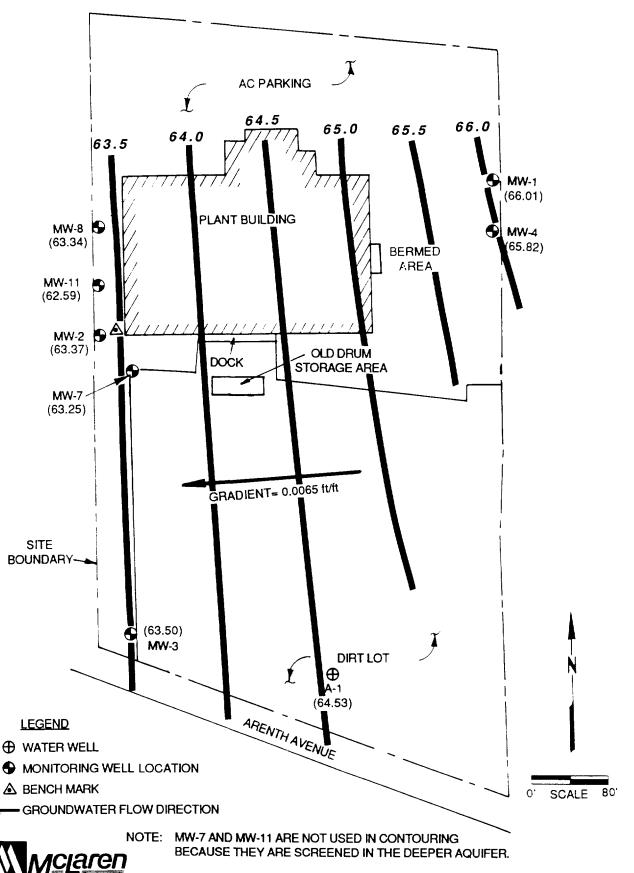
<sup>\*:</sup> Bench mark was selected from the top of the third parking billard at southwest corner of the building. The elevation of the bench mark was set at 100 feet.

NA: Information is not available.

<sup>\*\*:</sup> Measured on January 24, 1990.

a. Depth sounded on January 24, 1990. Well has been reported to be 120 feet deep by the well owner, Mr. Charles Miller.

FIGURE 4 GROUNDWATER ELEVATION CONTOURS THE MONADNOCK COMPANY JANUARY, 1990



### SECTION II

### SITE INSPECTION

### Introduction and Methodology

The site inspection of the property was performed on January 18, 1990. The objectives of the inspection were to note evidence of potential impact to the property by hazardous materials. The site inspection process was comprised of the following basic components:

- · Review of available property diagrams and environmental records;
- · Visual inspection of the property.

Prior to the on-site inspection, site plans of the facility were reviewed. The plans which are included as Appendix I were available through the Los Angeles County Department of Public Works and are described further in Section IV of this report. The plans indicate that Academy Ribbon Mills installed a trap below grade, referred to as a waste interceptor, in November 1963 (Plan M-5). The details for the trap are undated and the exact location is not referenced. It appears that the location referred to in M-5 corresponds to the location of the Men's Toilet Room on Plan P-2 and shown in detail on Plan P-4. Additionally, the plans show the location of the underground plumbing in relation to the heat treatment area, plating/dip area, and the degreasing area. A clarifier is also shown next to the west side of the building.

McLaren toured the facility on January 18, 1990, accompanied by Mr. Richard Paul, Vice-President, Operations, the Monadnock Company; Mr. Charles Miller, Property Owner and former facility manager; Mr. Jim Daunt, former facility engineer, the Monadnock Company; and Mr. Joseph Kwan and Mr. John Clark, both of TRW, Environmental Affairs. Mr. Miller and Mr. Daunt provided historical input during the site inspection and the personnel interview (see Section III) indicating locations of areas of importance such as the drum storage areas, equipment washdown areas, and degreasing areas. These areas are indicated on Figure 5. Figure 6 shows the current property usage. Descriptions of historical chemical usage, handling, and storage, as well as the site history are included in Section III.

### Detailed Inspection

The Monadnock facility is constructed with a solid concrete slab set on raised soil. The concrete slab is exposed above grade on the east, south and west sides of the building. The northern side of the building is set at grade due to the uneven surface topography across the site.

FIGURE 5 SITE HISTORICAL USE THE MONADNOCK COMPANY 18301 EAST ARENTH AVENUE, CITY OF INDUSTRY,CA

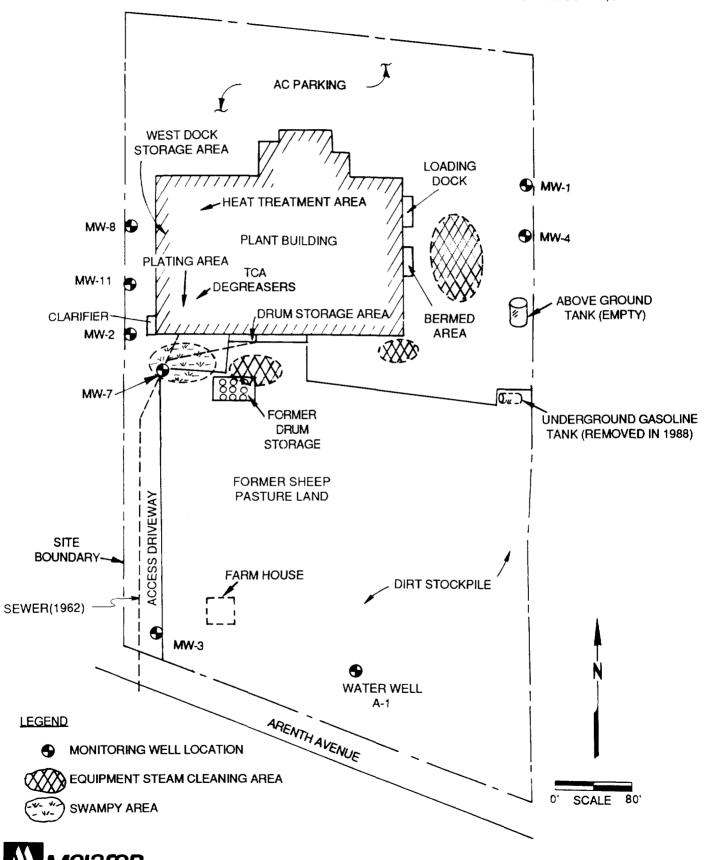
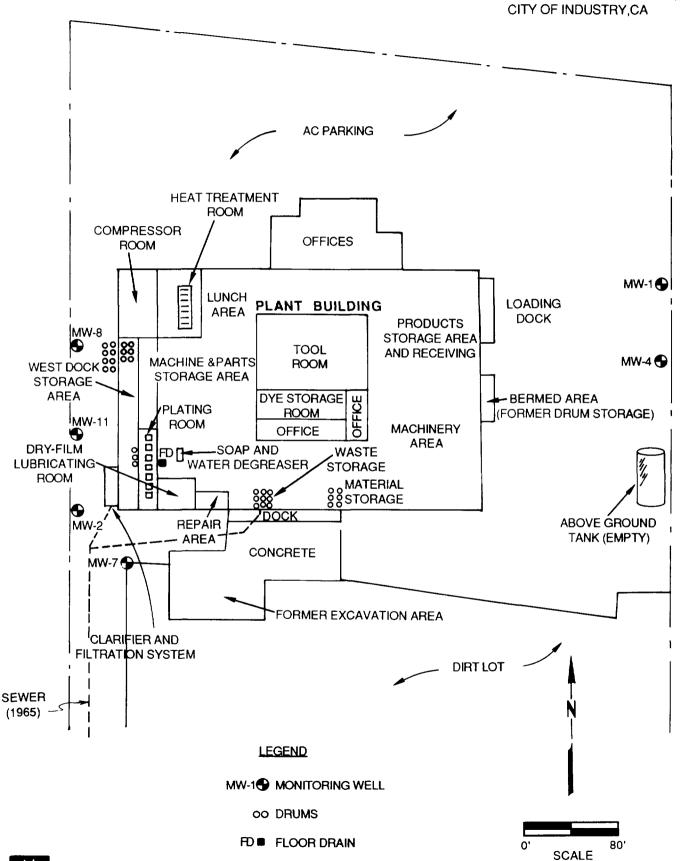


FIGURE 6
CURRENT SITE PLAN
THE MONADNOCK COMPANY
18301 EAST ARENTH AVENUE,
CITY OF INDUSTRY CA



A clarifier is located outside of the west wall of the building. The clarifier collects industrial wastewater from the plating and degreasing areas prior to discharge to the sewer. Floor drains which were located on the west dock no longer drain into the clarifier. These drains were plugged in 1983 or 1984. One soil boring was completed by Dames and Moore in 1986 in the area of the clarifier.

Several chemical storage drums are located along the west side of the building. Approximately 10 drums were stacked against the wall. There was no evidence of leakage from the drums and they do not appear to represent an environmental problem.

Drums of caustic were also stored on the north end of the west loading dock. On the south end of the west loading dock, acid and caustic are kept for use with the filtration and neutralization systems. The acid and caustic drums are on wooden pallets. Low concrete curbs prevent the mixing of material which has leaked or spilled from the drums and serve to divert the material into an appropriate filtration tank.

The filtration occurs in two approximately 800-gallon, cubical, polyethylene tanks which handle basic solutions and acidic solution, respectively. The tanks are contained by a secondary containment system consisting of a polyethylene berm, approximately 4 feet high. This system appears sufficient as secondary containment for the filtration tanks.

No floor drains were observed in the heat treatment room, although a floor clean out and drain from the equipment trench was noted on Plan P-2. According to Mr. Daunt, this piping was plugged in response to Los Angeles County Sanitation District request. Compounds used in the heat treatment process, such as carburizing fluid, were not discharged as waste, but are spent during the process. Water used to quench heated parts may overflow, but is contained within a recessed concrete pit. Originally, this water was pumped into the plumbing and diverted to the clarifier. The water is not believed to have contained any hazardous waste.

The plating area contains several small dip tanks, containing acids, into which parts suspended by an overhead crane are dipped for cleaning and plating. A trench, with a 6 inch thick bottom, collects liquids which have spilled as a result of this process. The trench, situated against the west wall, is concrete lined and approximately 10-12 inches deep and 12 inches wide. The trench slopes to the south. An acid-resistant drainage pipe carried liquid from the trench to the clarifier. This pipe was plugged and the contents of the trench are now piped, above grade, into the filtration system.

In the degreaser area, a floor drain and grated trench are used to intercept wash water from the floor. Currently, the degreaser system contains only water and detergent. The floor space near the degreaser is hosed down daily to carry any grime into the floor drain and trench. This trench has a pipe which drains into the clarifier. The current practice and use of detergent does not pose a problem of hazardous waste, however

the possibility exists that chlorinated solvents, used in the degreasing area, were washed into the trench.

The dry-film lubricating room, located near the southwest portion of the building, was reported by Mr. Paul to have been used for storage of drums of the dry-film lubricant (Lube-lok 4396) and 1, 4 Dioxane. Previously the room was also used to apply a dry-film coating to metal fasteners in order to prevent corrosion. According to Mr. Paul, this process was discontinued on site during 1989.

Stoddard solvent, which is approximately 85% nonane and 15% trimethylbenzene, is used in the repair shop area to clean hand tools. Approximately 10-20 gallons of the solvent is contained in a steel box which has a sealable lid. No history of spills is associated with this area. No spills were apparent in this area and the floor was intact.

The waste storage area, indicated on Figure 6, in the south-central part of the building, contains drums of metal cuttings coated with oil. There is considerable floor staining and oily residue in this area, but given the intact appearance of the concrete floor, no hazardous material is expected to have leaked to the soil.

The material storage area contained drums of Stoddard solvent and machine oils. The area appeared clean and no floor stains were evident. All drums were capped, some had dispenser pumps attached to the lids. This area does not appear to represent a potential source of contamination to the soil.

The machine area does not have floor drains. Polyethylene trays were under machines in this area, in order to contain oil leaks. In addition, there was no indication from historical use of the area to indicate leakage of hazardous wastes to the soil.

The tool room and dye-stamp storage room do not appear to present potential environmental problems. Plumbing beneath this area connects directly to the main sewer and does not go through the clarifier.

The small, concrete-beamed area along the east wall outside of the facility is not currently in use. Formerly it was used for drum storage.

One soil boring was placed near this area by Dames and Moore in 1986. VOCs were not analyzed, though drums of solvent may have been stored here.

The receiving and shipping area has no history of chemical usage, though spillage of received chemicals may have occurred. No stains appeared on the floor.

### SECTION III

### HISTORICAL RESEARCH

# Introduction and Methodology

Historical research of the property was performed to identify past sources of hazardous materials which potentially impacted the site or adjacent soils and underlying groundwater. Information regarding site history was obtained by conducting personal interviews with key employees, reviewing aerial photographs, and reviewing Building Department records. Sanborn insurance maps were not reviewed due to their unavailability for the subject site. Results of this research are summarized below.

### Personnel Interviews

Personnel interviews were conducted during a meeting with Mr. Charles Miller and Mr. Jim Daunt on January 18, 1990. Mr. Miller is the current property owner and former site manager of the Monadnock Company, and Mr. Daunt was a facility engineer of the company from 1966 to 1986. Mr. Joseph Kwan and Mr. John Clark from TRW also attended the interview. The purpose was to become familiar with historical property uses and to identify and evaluate present environmental impacts.

The following is a brief description of information gathered during the interview. Figure 5 shows the details of the historical property uses.

# Chemicals Usage, Storage, and Disposal

According to Mr. Miller and Mr. Daunt, various chemicals were used for parts degreasing, heat treating, bright dipping, and plating at the subject property from 1966. Table 4 shows a detailed description of quantity, storage, usage, and disposal of chemicals which they recall have been used on the site.

The product line was changed in 1971 because of a decrease in demand for copper and aluminum bomb-studs. In 1971, a plastic stud was invented and replaced the copper-aluminum stud made by Monadnock. Since then, the Monadnock Company reduced the quantity of copper and aluminum processed on-site, and these two metals were totally eliminated from the product line in 1974. The subsequent effect was to reduce the usage of trichloroethylene which had formerly been used during the cleaning process of the bomb-stud.

Waste materials were hauled away by Falcon Environmental Services. According to Mr. Miller and Mr. Daunt, there were no manifests documenting the waste disposal because the Monadnock Company got credit from the hauler toward their next purchase. Chemical suppliers to the subject site include Baron Blakeslee, Marathon Oil, Milhorn Chemicals, Van Waters-

Table 4
Utilization of Chemicals at the Monadnock Company, 1966-1987

Chemical	<u>Amount</u>	Storage	Usage and Disposal
• Nitric Acid (HNO <sub>3</sub> )	15 gal/mo	west dock	<ul> <li>used in the neutralization tank on-site (to ~ 1981).</li> <li>used for pH adjustment in plating line.</li> <li>used in bright dip for copper products.</li> <li>disposal through clarifier to sewer system.</li> </ul>
<ul> <li>Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>)</li> </ul>	?	west dock	<ul> <li>one time purchase, it was determined to be too severe to use.</li> <li>no waste, it was consumed in the plating process.</li> </ul>
<ul> <li>Hydrochloric Acid (HCl)</li> </ul>	~40 gal/mo	west dock	<ul> <li>used to adjust pH of water from plating system.</li> <li>was in use until 1980-1981.</li> </ul>
• Ammonium Nitrate (NH <sub>4</sub> NO <sub>3</sub> )	250 lbs/yr	west dock	<ul> <li>used for stripping cadmium (start in 1966-1967).</li> <li>pumped into drums and hauled away.</li> <li>disposal by Falcon Environmental Services.</li> </ul>
• Chromium (Cr)	660 gal/yr	west dock	<ul> <li>used with cyanide (CN) in plating process.</li> </ul>
• Caustic Beads	110 gal/yr	west dock	• used in plating process.
• Liquid Caustic	110 gal/yr	west dock	• used to adjust pH in the treatment tank.
• Cyanide (CN)	300 lbs/mo	west dock	<ul><li>used for plating.</li><li>destroyed by chlorine in process, waste hauled away.</li></ul>
• Trichloroethane (TCA)	275-1,650 gal/mo	inside facility	<ul><li>used in the degreasers.</li><li>stored in drums and exchanged.</li><li>reduced usage quantity in 1971.</li></ul>
• Carborizing fluid	165 gal/yr	compressor room	<ul><li>part of heat treatment process.</li><li>used up during process.</li></ul>

Table 4 (cont')
Utilization of Chemicals at the Monadnock Company, 1966-1987

Chemical	Amount	Storage	Usage and Disposal
• Lubricating Oils	<sup>-</sup> 30 gat/mo	south slab	<ul><li>used for lubricating machinery.</li><li>stored in drums and reclaimed.</li></ul>
• Cutting Oil	55 gal/yr	south slab	• stored in drums, waste reclaimed.
• Cadmium (Cd)	~100 lbs/wk	plating area	• through plating system.
• Zinc	?	?	• used during plating.
• Copper	?	inside facility	<ul> <li>bomb stud production</li> <li>stopped using in 1970-72</li> </ul>

NOTE: Quantities are estimated on an average basis; actual amounts at specific times may have differed.

Rogers, Pacific Smelting, Steins Western, Texaco, Wynn's, and Far Best.

According to Mr. Miller and Mr. Daunt, "citations" were never issued to the subject site by any agencies; however, they indicated that "warning notes" have been issued by Los Angeles County Sanitation District regarding high pH industrial waste water which was discharged to the county sewer.

# Site History

In 1966, according to Mr. Miller, the Monadnock Company transported its equipment from San Leandro, California, to the present facility location. However, reports on file indicate that the equipment was transported from Hayward, California. Mr. Miller indicated that the old equipment was cleaned using steam and solvents at the eastern side of the property (the current asphalt parking lot). According to Mr. Miller, as a result of this cleaning, washwater runoff ponded on site.

This pond area allegedly existed at the southwestern corner of the building from 1966 to 1969 and was referred to by Mr. Miller as "the swamp". Before a driveway was constructed through the area in 1969, this area allegedly accumulated all surface run-off at the site. According to Mr. Miller, the soil beneath the swampy area was dug out during grading of the driveway and was hauled away by Ben F. Smiths Company. Mr. Miller and Mr. Daunt both recalled that the excavated soil was never added to the soil pile now found at southeast portion of the vacant lot. Soil samples from boring C-6 at the runoff area indicate that low levels of solvents are present in the soil down to the saturated zone. Water from monitoring well MW-7 has elevated levels of solvents. Based on the analytical data, this area may have been a source of contamination to groundwater in the past.

In 1966, an addition was made along the western side of the Academy Ribbon Mill building. The addition included areas for power supply, a compressor room, a plating line, and a waste storage area. This is the only major physical change to the building since 1966. A spill containment system, consisting of concrete lined trenches, was added in the plating room in 1985.

Five degreasers, at most, were operated on this site at one time. Three of the degreasers were the spiral type and the others were box type. The degreasers were used to degrease copper studs at various stages along the copper product line. These degreasers were operated approximately 10 hours per day, and were removed during 1970 to 1974 because of the phasing out of the copper stud production. The degreasers were sold to a junk yard and the copper product line was sold to the Nippler Company. A new soap degreaser was bought. However, the soap degreaser never worked and

was abandoned. Waste sludge was collected from the bottom of the degreasers for reclamation. No floor cracks were found in the degreaser area.

The original clarifier was placed at the site in 1967 to treat effluent from the plating line. It was a two-stage clarifier with an attached sampling pit. Mr. Miller and Mr. Daunt have no knowledge of the three-stage clarifier shown on the Academy Ribbon Mill's site plan and believe that United Carr may have modified or backfilled it. The wastewater path to the clarifier is from the trench near the plating line, across the dock, into holding tanks for treatment before discharge to the clarifier, then to the sewer. The piping from the plating line is composed of aboveground 2-inch P.V.C. All floor drains in the plating room were plugged to prevent chemical solutions from draining to the sewer. In addition, a trench containment was placed at the west side of the plating area to catch spills caused by pumping activities.

In the late 1960's, a below-grade pump was operated in the heat treatment area to pump water through the drain to the clarifier. Water was used at the end of the heat treatment process for quenching and overflows are not recalled to have occurred. Chemicals were never used in the heat treatment area with the exception of carburi compound to harden the steel. The Los Angeles County Sanitation District required the floor drains in this room to be plugged. As described under the site inspection section, the heat treat room does not appear to have been the site of hazardous chemical source to the soil or groundwater.

Mr. Miller and Mr. Daunt did not recall any instances of illicit dumping on the 3.6 acres of undeveloped land south of the property.

### Aerial Photograph Review

Historical aerial photographs were obtained from the University of California, Santa Barbara collection, for the years 1960, 1964, 1968, 1977, 1980, and 1985. All photographs are black and white, with the exception of the 1980 photograph, which is color-infrared. These photographs were reviewed to identify evidence of past industrial land usage, spills or staining, extensive land disturbances, presence of aboveground tanks or pump islands, landfills, sumps or settling ponds, material storage areas, or gas stations on or near the subject property. These aerial photographs were of varying scales, as noted in the descriptions below.

# <u>1960</u>

The 1960 aerial photograph (approximate scale 1:14,400) shows that the property had been graded. The San Jose Creek was unchannelized, and a tributary to San Jose Creek bisected the property into north and south halves. Several small farm buildings were present in the southwest corner

of the property. Property to the north had buildings of apparent industrial and residential use. Surrounding property to the south, east, and west was vacant and cleared.

## <u> 1964</u>

The 1964 aerial photograph (approximate scale 1:90,000) shows the Monadnock building in its present configuration. The San Jose Creek remains unchannelized, but the tributary has been backfilled. The Monadnock plot and the plot immediately to the east have been graded. Farm buildings are still present in the southwest corner of the property, and surrounding sites appear to be the same as in the 1960 aerial photograph. Activity on the subject site is not identifiable due to the scale of the photograph.

#### 1968

The current Monadnock building is apparent on 1968 aerial photograph (approximate scale 1:24,000). There has been a light colored roof added to the building on either side of the northern entry. The Monadnock building and asphalt parking areas (with several parked cars evident) are on the northern half of the property, and the southern half is bare The unpaved ground surface bordering the asphalt immediately south of the Monadnock building appears dark colored in an irregular pattern which may indicate moisture or staining. This area was subsequently sampled by other consultants and identified as having high concentrations of VOCs. Soil in this area has been excavated, as described under Section I Background. Some structures - possibly waste bins - are near the dark areas. Farm buildings and trees remain in the southwestern corner, and the surrounding areas are unchanged. Jose Creek has been channelized.

#### <u> 1977</u>

The 1977 aerial photograph (approximate scale 1:28,000) shows that the northern part of the Monadnock building has been altered. A concrete paved area has been added in the south parking area, at the central part of the building. Some storage of small containers is evident in what is currently called the old drum storage area. The southern half of the lot is vacant and buildings which were previously in the southwestern corner are gone. The area to the north is unchanged, although industrial development to the northeast is apparent. An industrial building is located approximately 500 feet east of the Monadnock site, and for 4,000 feet beyond, the area is vacant. Vacant dirt lots are present to the south across the San Jose Creek channel and also to the west.

### 1980

No changes onsite are apparent in the 1980 aerial photograph (color infrared; approximate scale 1:40,000). There is no evidence of irregular moisture or staining associated with the property. A slight topographic depression is noticeable approximately 200 to 300 feet south of the

Monadnock building in the east-central section of the dirt lot. This depression may represent an ancestral tributary to the San Jose Creek. It is unlikely that this depression could have received runoff directly from the Monadnock paved lot because of the distance between the two areas and would not represent a source of contamination. The building east of the lot has been enlarged to twice its original size, and surrounding properties to the north, south and west remain unchanged.

#### 1985

On the 1985 aerial photograph (approximate scale 1:6,000), the southern half of the property is still a vacant, dirt lot. Some drum storage is evident along the eastern and southern sides of the Monadnock building. Drums which are stored unprotected from the elements present a potential for leakage to the ground surface. In 1986, Dames and Moore sampled soil next to the easterly uncovered drum storage area and analyzed for TPH only. TPH was detected at 2.0 ppm. Other analyses were not performed.

Several drums also appear to be stored along the edge of the dirt, south of the building. As discussed for the 1968 photograph, this area was identified as having VOC soil contamination and it was excavated in 1987. In addition, along the southern edge of the parking lot and near the drums are several bins or crates, some of which are approximately 10 feet long and 5 feet wide.

Several crates and boxes are also stacked on the asphalt near the southeastern property boundary. In 1986, Dames and Moore collected one surface soil sample, S-2 from soil stockpiled near the areas where bins and crates had previously been stored. They analyzed the sample for heavy metals only and determined that the soil had significant levels of cadmium and zinc. Removal was recommended, but the disposition of the soil is unknown.

Property to the north remains unchanged, and there is storage of crates along the eastern property line on the eastern side of the building. The property to the south remains vacant, but the topographic depression identified in the 1980 photograph has been backfilled and Rowland Street has been extended eastward. The area between Rowland Street and the San Jose Creek channel has been entirely regraded, and there are multiple dirt stockpiles near the center of the plot. To the west, a rectangular feature, possibly a building foundation, has been graded. An old drainage observed on the 1960 photograph and which had extended from the Monadnock building site westward across the neighboring plot, has been backfilled and regraded. Because of the proximity of this drainage to the Monadnock site, if any spills or runoff from the site had occurred, liquid could have collected in this drainage. Monitoring wells located on the western property boundary and near this drainage, MW-8 and MW-11, contain elevated concentrations of VOCs, as discussed in Section I.

### Los Angeles County Department of Building and Safety (LACODBS)

The files in the LACoDBS generally include various permits for occupancy, demolition, and reconstruction or remodeling. These permits indicate past ownership and/or names of property operators and may also indicate the presence of any underground tanks or storage areas; the installation of fire doors or application of fire proofing materials; and/or the occurrence of alterations or reconstruction.

Records in the Los Angeles County Department of Building and Safety were reviewed on December 8, 1989. Permit information was available dating from 1963 to 1966, and included building renovation and a gasoline tank installation. Table 5 summarizes the permit information at the Monadnock Company site.

According to Ms. Carmen Irigoyen of the LACoDBS, there are no permit records for the subject site after 1966.

Table 5

Permit Information in the Los Angeles County Department of Building and Safety

Name (Tenant/Owner)	Permit Type	<u>Date</u>	Notes
Academy Ribbon Mills	1	3/12/1963	New building for manufacturing paper and cloth ribbon
	3	3/12/1963	House sewer connecting to public sewer
	1	4/11/1963	Installed two 200,000 BTU unit heaters
	2	8/12/1963	3 wash sinks, 10 floor drains, and 2 floor sinks
	2	6/10/1964	One clarifier
La Bond	4	11/12/1965	Grading for Industry plant
Cinch-Monadnock Company	1	2/18/1966	Added room for storage and bright dip
	1	2/26/1966	Added a compressor room
	2	3/3/1966	3 floor drains, one grease trap, and one sump
	3	6/23/1966	House sewer connecting to public sewer, and one clarifier connecting to house sewer

Permit type: 1. Building Permit

2. Plumbing Permit

3. Sewage Disposal Permit

4. Grading Permit

Table 5 (cont<sup>1</sup>)

Permit Information in the Los Angeles County Department of Building and Safety

Name (Tenant/Owner)	Permit Type	<u>Date</u>	<u>Notes</u>
Cinch Monadnock Company	1	10/21/1966	Added new roof for lunch area
	1	10/24/1966	Altered building for installing monorails and crane runways
	2	10/27/1966	One waste line
	1	3/9/1967	Installed gasoline tank
	1	6/27/1967	Added one above ground liquid holding tank
	1	7/10/1967	Added new room for painting area
	1	9/14/1967	Added room for air conditioning
	1	3/19/1968	Added one above ground liquid holding tank

Permit type: 1. Building Permit

2. Plumbing Permit

3. Sewage Disposal Permit

4. Grading Permit

#### SECTION IV

#### AGENCY RESEARCH

## Introduction and Methodology

Agency records were researched for the subject property to obtain information regarding hazardous materials usage, storage, reported spills, and soil or groundwater contamination.

State and Federal hazardous substances and material lists were reviewed to identify property within a one-half mile radius of the site that may have impacted the subject property. These lists would indicate if a known or potential release of hazardous materials has occurred on the property or surrounding properties, and if the property or nearby properties are involved in any Federal or State cleanup actions.

#### Subject Property

McLaren contacted the following agencies by telephone, letter, and/or in person regarding file information for the Monadnock Company site in City of Industry:

- California Department of Health Services (CDHS);
- California Department of Conservation Division of Oil and Gas (DOG);
- Regional Water Quality Control Board Los Angeles Region (RWQCB-LA);
- South Coast Air Quality Management District (SCAQMD);
- Los Angeles County Department of Health Services (LACoDHS);
- Los Angeles County Department of Public Works (LACoDPW);
- Los Angeles County Fire Department (LACoFD);
- Los Angeles County Sanitation District (LACoSD); and,
- City of Industry, Department of Engineering (CIDE).

Results of the file research and the information requested from each of the agencies are discussed below.

## California Department of Health Services (CDHS)

According to Ms. Bertha Fleming of CDHS in the Burbank office and Ms. Julie Johnson in the Long Beach office, no files exist in the CDHS record under the name of "Cinch Monadnock Company", "TRW/Cinch Monadnock Company", or "The Monadnock Company". Generally, records at the CDHS contain information regarding whether the property is a hazardous waste site or hazardous waste generator, and if any industrial waste discharge permits have been issued for this property. Although a site may have a Generator I.D., the local DHS offices may not have file information on the site. Apparently, no file exists for the Monadnock Company.

## California Department of Conservation - Division of Oil and Gas (DOG)

According to the DOG Regional Wildcat Map #W1-5, dated June 19, 1986, eight plugged and abandoned wells are present within one-half mile of the Monadnock Company site. Oil wells, or improperly abandoned oil wells, can sometimes present conduits for methane seepage. These wells, including seven dry holes and one oil well, were drilled during 1930 to 1956, and total depths of these wells ranged from 908 to 4,133 feet below ground surface. Table 6 shows the detailed information of these abandoned wells. One abandoned oil well, Billy Rowland #1, was located approximately 0.3 miles south of the Monadnock Company site. This well was drilled by the Barry Oil Co. Inc., in 1942 and total depth of this well was 2,432 feet. According to the well performance report in 1945, this well had an average daily yield of four barrels of oil and one barrel of water. The oil well was abandoned completely on May 2, 1989 and abandonment was approved by the DOG on November 21, 1989.

## Regional Water Quality Control Board - Los Angeles Region (RWQCB-LA)

Files from the RWQCB-LA have been reviewed as recently as December 21, 1989. This review emphasized the actions which have been taken by the RWQCB-LA and the Monadnock Company since 1986. Table 7 shows a brief chronology of the information in the RWQCB-LA files.

## South Coast Air Quality Management District (SCAQMD)

According to Ms. Charlene Christopher of the SCAQMD, there are no records of any permits and violations under the name of the Cinch Monadnock Company. However, a file exists under the name of the Monadnock Company. According to the file, the Monadnock Company applied for a permit for a degreaser on June 7, 1982. However, the application for the degreaser was cancelled by the company. The SCAQMD records do not explain the reason for the cancellation of the application. There are no records of any other permits or violations at this site.

Table 6
Well information in the California Department of Oil and Gas

Well Location	Year Drilled	Total Depth	<u>Status</u>
2S/10W/14E1	1930	3,726 feet	abandoned dry well
2S/10W/14E2	1935	4,133 feet	abandoned dry well
2S/10W/14E3	1944	1,187 feet	abandoned dry well
2S/10W/14E4	1956	2,625 feet	abandoned dry well
2S/10W/14F1	1930	2,520 feet	abandoned dry well
2S/10W/14F2	1947	2,769 feet	abandoned dry well
2S/10W/14F3	1956	2,564 feet	abandoned dry well
2S/10W/14F4	1942	2,423 feet	abandoned oil well
2S/10W/14K1	1934	3,190 feet	abandoned dry well
2s/10w/14R1	1943	3,264 feet	abandoned dry well

#### Table 7

<u>Date</u>	Actions
10/20/1986	The board received a preliminary site assessment by Dames and Moore for the Monadnock Company. In this assessment, elevated concentrations of Trichloroethylene (TCE); Tetrachloroethylene (PCE), 1,1,1-Trichloroethane (TCA) were discovered in the soil and groundwater. Metals, CN, and TPH were also found in some samples.
11/21/1986	The RWQCB sent Mr. Miller a request for a comprehensive workplan to determine lateral and vertical extent of soil and groundwater contamination.
1/14/1987	The RWQCB received and reviewed a letter workplan and determined it to be incomplete.
6/24/1987	The RWQCB received and reviewed "Second Supplement to Site Assessment Evaluation and Proposed Remedial Action Plan", which described work already performed, but did not include a comprehensive workplan.
2/1988	The Monadnock Company had a deep monitoring well, MW-11 installed.
4/29/1988	A letter was included in the file referencing the unsigned Cleanup and Abatement Order (#88-2) directing C.M. Miller and/or TRW to conduct a soil/groundwater investigation.
5/11/1988	Cleanup and Abatement Order No. 88-2 was issued to C.M. Miller Enterprises, Inc. and the Monadnock Company to cleanup and abate the effects of contaminants discharged to soil and groundwater.
5/19/1988	Stearns, Gross, Moore and Rusch, C.M. Miller's legal representative, submitted affidavits which stated that TRW, Inc., is responsible for contamination at the Monadnock facility and should be added to the Cleanup and Abatement Order.
5/31/1988	C.M. Miller Enterprises responded to the RWQCB Order Item #12 concerning the lack of an adequate cover and requisite in filling of an open excavation in which rain water had collected. Mr. Miller proposed to fill the existing excavation with soils compacted to 95% and covered with a clay cap meeting the RWQCB requirements, and a four-inch thick concrete slab finished to grade.
6/8/1988	C.M. Miller submitted a revised work plan to incorporate recommendations of Mr. Philip Chandler of the RWQCB for soil and groundwater investigation in response to Order No. 88-2. The work plan entitled "Work Plan for Investigation of Extent of Possible Soil Contamination in the Unsaturated Zone at the Monadnock Site", addressed the Order Item #12 concerning backfilling and clay capping of open excavation on site.
6/10/1988	The new Monadnock Company requested that they be removed from the Cleanup and Abatement Order because they have not discharged hazardous waste at the site. The Monadnock Company claimed that TRW, the original owner and operator of the site, was not named, even though there is evidence that wastes were discharged while they operated the facility.

## Table 7 (Cont')

<u>Date</u>	<u>Actions</u>
6/30/1988	C.M. Miller submitted "Work Plan to Determine the Lateral and Vertical Extent of Soil and Groundwater Contamination at the Monadnock Site" to address all other requirements contained in the Cleanup and Abatement Order which were not addressed in the June 8, 1988 work plan.
8/8/1988	The RWQCB sent a letter to Mr. Miller and indicated that the soil cleanup proposal from 6/8/1988 does not satisfy all requirements to eliminate the threat to groundwater associated with the soil contamination at the excavation.
8/26/1988	C.M. Miller submitted a letter to the RWQCB and indicated that the RWQCB had reversed its position on requirements needed for clay caps. Mr. Miller indicated that the new RWQCB specifications for clay caps would double the cost. It would be difficult and perhaps impossible for C.M. Miller Enterprises to pay for future costs of site remediation. Mr. Miller also recommended that TRW should be included in the Cleanup and Abatement Order 88-2.
8/26/1988	The RWQCB complied with TRW's request and left them off the Order 88-2 "for the moment". TRW was requested by the RWQCB to give specific information regarding degreaser operation, clarifiers, chemicals, and maps of chemical storage locations.
11/3/1988	The new Monadnock Company responded to the RWQCB letter dated September 23, 1988. This is regarding the RWQCB's request for chemical analytical data and point by point answers to questions about the site inspection on August 4, 1988.
11/18/1988	The RWQCB requested information from the City of Industry regarding two violations, No. 20112 dated August 24, 1978, and No. 30256 dated November 8, 1988, pertaining to the Monadnock Company site.
12/2/1988	Mr. Miller submitted a revised work plan to incorporate recommendations of the RWQCB made on October 17, 1988. This letter is a point by point response to the October 17, 1988 letter.
12/14/1988	The attorney for the new Monadnock Company asked the RWQCB to add his name to the mailing list for the Monadnock site.
12/28/1988	The RWQCB reviewed and approved the "Revised Work Plan for Soil Remediation at the Monadnock Site", submitted by Mr. C.M. Miller.
1/11/1989	The new Monadnock Company requested that the RWQCB dismiss the company from the Cleanup and Abatement Order #88-057.
2/10/1989	Ralph Wagner Consulting Engineer submitted the preliminary report, "Soil Remediation at the Monadnock Site," to the RWQCB.
6/14/1989	The RWQCB sent "Monitoring Well Design/Construction/Development and Sampling Protocols" to Mr. C.M. Miller.

## Table 7 (Cont')

Date	Actions
6/21/1989	The RWQCB requested Mr. C.M. Miller revise the workplan regarding the soil remediation at the Monadnock facility.Mr. Miller submitted this workplan on May 10, 1989.
6/30/1989	The RWQCB requested Mr. C.M. Miller include a comprehensive on-site assessment at the Monadnock Company facility in his soil remediation workplan.
7/8/1989	Ralph Wagner Consulting Engineer submitted a letter to the La Puente Basin Watermaster to request the detailed information regarding remediation of groundwater contamination by pumping water near the Monadnock site.
7/22/1989	Raiph Wagner Consulting Engineer submitted the groundwater analyses results (samples taken on June 6, 1989, from the Monadnock site) to the RWQCB. Elevated concentrations of TCE and PCE were shown in the monitoring wells MW-2, MW-7, MW-8, and MW-11.
8/15/1989	Mr. C.M. Miller submitted a "Detailed Closure Plan and Specifications for Backfill and Closure of Existing Excavation" to the RWQCB.
8/29/1989	The La Puente Basin Watermaster (LPBW) sent a letter to Ralph Wagner Consulting Engineer regarding the groundwater remediation at the Monadnock site. The LPBW indicated that there is no limit on the volume or rate of extraction of groundwater which can be pumped for cleanup. In addition, the LPBW has no objection to re-injection of the cleaned water pursuant to the approval of the RWQCB. However, the LPBW preferred that cleaned water remain re-injected back to the basin. This information refers to the LPBW Resolution 89-1 "Addresses the responsibilities of non-party cleanup pumpers".
9/5/1989	Ralph Wagner Consulting Engineer submitted the response from the La Puente Watermaster to the RWQCB as one possible option for groundwater remediation.
9/19/1989	City of Industry verified that the excess dirt from the construction of Arenth Ave. was stockpiled along the front of the Monadnock site for possible future use by the property owner.
10/3/1989	Ralph Wagner, Consulting Engineer, sent information to Mr. C.M. Miller regarding the details of the existing 8-inch sanitary sewer serving the Monadnock building.

## Table 7 (Cont')

<u>Date</u>	<u>Actions</u>
10/27/1989	Mr. C.M. Miller submitted a letter to the RWQCB to request a delay of 30 days for identifying the responsible parties of the Cleanup and Abatement Order 88-057.
11/6/1989	The South Coast Air Quality Management District (SCAQMD) sent a letter to the RWQCB and indicated that the SCAQMD currently regulates the handling of volatile organic compounds (VOC) contaminated soil by Rule 1166. Since the soil is contaminated with less than 1 ppm of tetrachloroethylene (PCE), this soil would be exempt from the requirements of Rule 1166.

#### Los Angeles County Department of Health Services (LACODHS)

Files at the Los Angeles County Department of Health Services contain information regarding hazardous waste materials use, storage and disposal, discharge permits, spills, and cleanup actions at the site. In addition, the site investigation notes by the inspector is also shown in the record.

Records indicate that the Monadnock Company has used various chemicals for parts stamping, heat treating, degreasing, bright dipping, painting, and plating at this plant. The characteristics of these chemicals are described in detail on the chemical manufacturer's Material Safety Data Sheets (MSDS). The earliest MSDS record in the LACODHS file is from March 20, 1984. Table 8 shows the details of the MSDS records available at LACODHS.

Uniform Hazardous Waste Manifests (manifest) provide information including types of hazardous waste, quantity, and location of the disposal site. According to a manifest dated January 25, 1989 (Manifest #88601842), a total of 8,200 pounds of inorganic filter-cake sludge with metal residue from parts stripping separation was transported and disposed of at the Casmalia Resources facility. On February 17, 1989, 350 gallons of waste oil were removed from the Monadnock Company (Manifest #38299836). The March 6, 1989 manifest (Manifest #88048649) indicated that seven drums (5,500 pounds) of inorganic sludge containing 25 to 30,000 ppm of cyanide were transported and disposed of at the Chemical Waste Management-Kettleman Hills site.

Prior to 1984, the LACoDHS did not keep MSDS and manifest records.

#### Los Angeles County Department of Public Works (LACoDPW)

The Los Angeles County Department of Public Works has records (file # 5735) on the Monadnock Company site from 1963. According to the file, the site was occupied by the Academy Ribbon Mills Company in 1963 and the address was 18300 East Valley Boulevard in City of Industry.

An industrial waste survey on January 12, 1964 indicated that the Academy Ribbon Mills company dyed, packaged, and sold cotton ribbon. Dyes were mixed in large pots and then applied to ribbon. Glue was used to paste ribbon onto rolls. Residue from glue and dye mixing pots was washed down into a large floor sink that drained to a trap at approximately 1,000 gallons per day. The survey did not indicate the location of the floor sink, but a trap is indicated on Plan M-5, included in Appendix I. The indicated location corresponds with Cinch-Monadnock's Men's Room. An existing trap was not indicated on the Cinch-Monadnock plans, P-2 and P-4. VOCs were common constituents of glue products 30 years ago and metals were used to color the dyes. Possible leakage from this trap may have resulted in VOC or metal contamination to soil and groundwater.

Table 8

Material Safety Data Sheets (MSDS) Records in the Los Angeles County Department of Health Services

Chemicals	Manufacturer	MSDSDate
Petroleum Hydrocarbons and Additives	Mobil Oil Corporation	3/20/1984
<ul> <li>Lube-Lok 4396 Concentrate (MEK, Xylene, Toluene, and n-Butyl Alcohol)</li> </ul>	Electrofilms, Inc	7/28/1986
Sodium Hydroxide, Anhydrous	Harrisons & Crosfield (Pacific) Inc	12/1/1986
<ul> <li>Isobrite 541         (Water solution of quaternized         ammonium salt)</li> </ul>	Witco, Allied-Kelite Division	4/13/1987
• Isodite 1B-0D (Chromic acid solution)	Witco, Allied-Kelite Division	8/26/1987
• 1,4 Dioxane (diethylene oxide)	E/M Corporation	9/18/1987 & 2/20/1989
• Gillite 905-XX (Sodium dodecylbenzene sulfonate)	Man-Gill Chemicals Company	7/11/1988 & 12/27/1988
<ul> <li>Mineral Spirits 75 (Volatile Solvent)</li> </ul>	Unocal Chemicals Division Union Oil Company of California	9/2/1988
• Pulsar Pellets (Calcium Hypochlorite 65%)	Olin Corporation	10/27/1988

On December 7, 1965, the facility requested a name change from Academy Ribbon Mills to the Cinch-Monadnock Company.

According to an industrial waste survey dated May 6, 1966, the Cinch-Monadnock Company manufactured clamps, washers, and heat sinks used in automobile, aircraft, appliance, and electronic industries. Parts were stamped, heat treated, degreased and then bright dipped, cadmium plated or painted as required. Chromic and sulfuric acids were used in the bright dip and cadmium plating processes. The type of industrial waste water generated during the manufacturing process includes cadmium rinse, degreaser waste, and acid cleaning waste. The quantity of the waste was approximately 900 gallons per hour. The waste was treated at the west side of the building and discharged to San Jose Creek.

On March 20, 1970, the address at the site was changed from 18300 East Valley Boulevard to 18301 East Arenth Avenue.

In February, 1987, a water sampling program in the San Jose Creek was performed by Ralph Wagner Consulting Engineer. Water samples were collected at 500 foot intervals and covered approximately 5,000 feet upand down-stream along the San Jose Creek from the Monadnock Company site. Mr. Wagner was unable to collect a water sample at the closest downstream location to the Monadnock Company because of insufficient surface water The water samples were analyzed for trichloroethylene in the channel. tetrachloroethylene (PCE), and trichloroethane (TCA). analytical results indicated that TCE, PCE and TCA were not present upstream of the facility, but elevated concentrations of TCE, PCE, and TCA were evident at all sampled locations to approximately 5,000 feet downstream of the Monadnock Company. As discussed in Section I, Previous Environmental Studies, this sampling does not indicate that Monadnock is the source of VOCs in San Jose Creek downstream of the facility.

Plan maps of the Academy Ribbon Mills (1962) and the Cinch-Monadnock Company (1965) were also obtained from the LACoDPW. Table 9 describes the plan maps. The plan maps, presented as Appendix I in this report, provide detailed information on degreaser, sewer, and plumbing locations. In addition, the construction details of the treatment and processing systems are also shown in these maps.

On January 11, 1988, a 1,000-gallon underground gasoline tank was removed from the eastern side of the property by Falcon Disposal. No rust or leaks were evident on the tank, and no groundwater was encountered during the tank removal operation. Two soil samples, one from each end of the tank site at approximately 10 feet below grade, were collected from the tank excavation pit for analysis of Total Petroleum Hydrocarbons (TPH). No odors were detected in any of the soil samples. Analytical results indicated that one soil sample was non-detected, and the other detected TPH at 1.8 parts per million (ppm) which is lower than the LACoDPW accepted action level of 100 ppm for TPH in soil. Therefore, the excavation pit was backfilled and resurfaced to grade. The tank closure report is presented in Appendix II.

Table 9
Plan Maps in the Los Angeles County Department of Public Works

Facility Name	<u>Plan Number</u>	<u>Date</u>	<u>Plan Title</u>	Description
Academy Ribbon M	ill			
	M-1	9/9/1962	Plot plan and schedule	Plot plan and locations of planned utilities servicing building.
	M-5	9/9/1962	Plumbing plan and details .	Space plan details of internal plumbing, includes note indicating installation of a trap (SA94) installed in November, 1963 in the Dye and Glue Laboratory, located along the west side of the building.
Cinch-Monadnock	unknown	unknown	Waste interceptor	Specifications for below grade waste interceptor (SA94) which shows a three-stage clarifier. Plan is undated and location of installation is not shown, but is assumed to fit location indicated on M-5, based on piping details.
	P-1	5/6/1966	Plot, roof plan and legend, plumbing	This plan shows location of sand and grease interceptor, alterations to exterior plumbing, and roof line, and includes the legend for plumbing abbreviations used on subsequent plans.
	P-2	5/6/1966	Additions and alterations- first floor plumbing plan	Shows intended use of floor space and alterations to plumbing, including addition of line from the degreaser and debarring area to the waste interceptor, and plumbing with floor clean outs along the west dock.

Table 9 (cont)

Plan Maps in the Los Angeles County Department of Public Works

Facility Name	<u>Plan Number</u>	<u>Date</u>	<u>Plan Title</u>	Description
Cinch-Monadnock	P-3	5/6/1966	Additions and alterations- partial fire sprinkler and plumbing plan and details	Includes detailed plans of sand and grease interceptor (drawing B). Concrete in walls and floor is 6 inches thick and is reinforced. This plan indicates a three stage clarifier, 10.25 feet long.
	P-4	5/6/1966	Additions and alterations- Plumbing sections and details	Detail C shows dip tank and collection trench. Detail D shows quench tank pit in Heat Treat Room, with plumbing details to the sump and floor drain for overflow water.
	P-5	5/6/1966	Additions and alterations- Plating line floor plan, legend and	Shows details of use of west dock including 18 dip tanks, detailsammonia tank, and furnaces.
	unknown	8/16/66	Plating layout	Undated plan approved by Los Angeles County Sanitation District on 8/16/66, shows addition planned for the plating layout.

### Los Angeles County Fire Department (LACoFD)

The Los Angeles County Fire Department, Hazardous Materials Section, has current chemical inventory information for the Monadnock Company. According to the inventory (reporting period from January 1 to December 31, 1989), the site uses a cadmium plating solution, which is a mixture of sodium cyanide and cadmium oxide. They list the maximum daily amount used as 840 gallons.

#### Los Angeles County Sanitation District (LACoSD)

Files at the Los Angeles County Sanitation District contain information regarding permits for the Monadnock Company to discharge wastewater to the public sewer system. In addition, violation notifications for chemicals exceeding the LACoSD effluent limits in the discharge wastewater are also in the files.

The earliest LACoSD record of the Monadnock Company is from October, 1978. According to the files, a violation notice (V-20112) was issued on October The TRW/Cinch Monadnock Company had a permit to discharge 13. 1978. plating wastewater from a barrel to the sanitary sewer (Industrial Wastewater Permit 3287). A wastewater sample was taken by the District's monitoring crew on August 24 and 25, 1978. Analytical results indicated that the wastewater contained concentrations of cyanide and cadmium in excess of the District's limits. In addition, the lack of a spill containment system was also mentioned in the violation notice. The LACoSD indicated that since all flowing rinses are piped through a system where chlorine is added for cyanide destruction and the wastewater is then discharged to a floor drain, construction of a dike around this drain with the rinses pumped over and into the drain would be one possible spill containment system.

Industrial Wastewater Discharge Permit No. 8959 was issued on December 2, 1981 to the Monadnock Company after dissolution of the TRW/Cinch Monadnock Company. Wastewater constituents permitted cadmium (Cd), chromium (Cr), cyanide (CN), zinc (Zn), and acid. Discharge to the sewer was listed as approximately 3,500 gallons per day (gpd). Other chemicals noted as being handled at this facility include chlorine bleach (hypochlorite), sodium hydroxide, cadmium hydroxide, sodium cyanide, nitric acid, and zinc chromate. The permit also required that periodic laboratory analyses of CN, Cd, Cr, Zn, oil and grease, and pH be performed on the wastewater.

Records of the LACoSD indicate that wastewater discharged into the sewer system by the Monadnock Company had levels of CN and Cd which periodically exceeded U.S. Environmental Protection Agency (EPA) maximum concentrations as specified in 40 CFR-Part 413. Maximum concentrations specified by the EPA are 5 parts per million (ppm) for CN and 1.2 ppm for Cd. In order to correct the high CN and Cd levels in the wastewater discharge, the Monadnock Company improved the deck diking and all tank plumbing, and installed new mixers and chemical feed pumps, and filter presses in the facility. The Monadnock Company has also constructed a spill containment

wall around the floor drain mentioned in the October 13, 1978 letter, to control their spill problem. A new Industrial Wastewater Discharge Permit (No. 8959 R-1) was issued to the company by the LACoSD on December 10, 1985 after all construction work was completed at the site. In the event of any leakage along the sewer line, there is the potential for cyanide and cadmium to have been released to the soil.

The latest Warning Notice of Violation #2901 was issued on March 22, 1989 for failure to maintain in good working order the industrial wastewater pretreatment device. This notice was issued because no pH chart paper was placed on the pH recorder at the clarifier. This omission does not directly affect soil and groundwater integrity, unless a release is not caught due to the lack of pH monitoring.

TRW provided McLaren with correspondence dated 1971 to 1980, regarding LACoSD permits, effluent data, and warning letters. The letters of warning are for exceeding Phase I effluent requirements and for late submittal of wastewater characterization tests. This correspondence is included as Appendix III.

## City of Industry, Department of Engineering (CIDE)

According to Mr. Philip Iriarte of the City of Industry, there is a letter dated October 29, 1965, in the Cinch Monadnock file. This letter requested permission from the City of Industry to install a three unit complex of trailers for office space at the subject site. No other information is in the file. Mr. Iriarte referred McLaren to the Los Angeles County Sanitation District for violation records of the subject property.

#### State and Federal Lists

The State and Federal lists reviewed for sites within one-half mile of the Monadnock Company include the following:

- Cortese Hazardous Waste Plan and Substances Site List; pursuant to AB 3750;
- Bond Expenditure Plan for the Hazardous Substances Cleanup Bond Act of 1984;
- SWIS Solid Waste Information System including both active and inactive landfills;
- CERCLIS Listing of known or potential hazardous materials release sites; part of U.S. EPA Superfund program;
- NPL National Priorities List; a ranking of Superfund sites;

- LUST Leaking Underground Storage Tank List; a listing of all releases reported to the Regional Water Quality Control Board (RWQCB); and,
- TPCA Toxic Pit Cleanup Act list from the RWQCB.

The Stop and Go Market, located at 18039 East Valley Boulevard, was listed on the LUST list and was the only nearby site to appear on any of the State and Federal lists. An RWQCB file for this potential soil contamination source was researched and reviewed. According to the file at the RWQCB-LA, the Stop and Go Market site, which is located approximately one-half mile west of the subject property, had a preliminary investigation for soil contamination performed in 1985. During the investigation, four soil borings were drilled to a total depth of 20 feet and soil samples were collected at 5 foot intervals. Analytical results indicated that no contamination was detected in any soil samples. The case was closed in 1985.

#### SECTION V

#### ADJACENT PROPERTIES REVIEW

## Introduction and Methodology

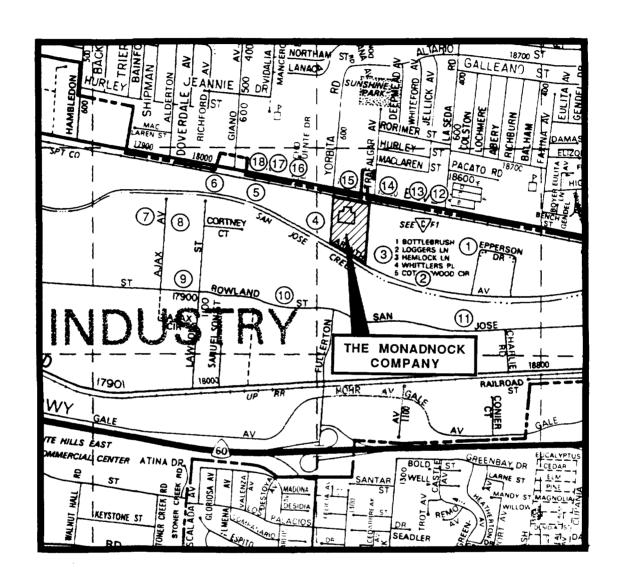
A "curbside" identification of the adjacent facilities within one-half mile of the Monadnock site was performed on December 7, 1989. These facilities were evaluated as to which have a potential for releasing hazardous materials to soil or groundwater. Limited agency research was conducted for these properties.

## Detailed Adjacent Properties Agency Review

Table 10 lists the facilities which are located within one-half mile of the subject site. The numbers assigned to these facilities on Table 10 are located on Figure 7. These adjacent facilities are not found in the leaking underground tanks lists (dated July 1989) provided by the Regional Water Quality Control Board, Los Angeles Region (RWQCB-LA); however, there are two facilities, General Telephone Company (GTE) and Calgon Vestal Laboratory, which have underground tank information existing in the Los Angeles County Department of Public Works (LACoDPW). The following are the information in the LACoDPW.

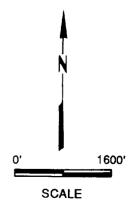
GTE, located approximately 1,100 feet northwest of the Monadnock site, has a 4,000-gallon diesel underground tank on site. This tank was installed in 1978. A tank and product line leak test was performed on September 22, 1987. Results indicated that the tank and accessory line passed the test.

Calgon Vestal Laboratory is located approximately 2,600 feet southeast of the subject site and is south of San Jose Creek. According to the records at the LACoDPW, this site had two 10,000-gallon underground tanks. In 1988, both tanks were removed and contaminated soil was found beneath the tanks. Contaminants include total petroleum hydrocarbons (456 ppm) and tetrachloroethylene (71 ppb). Further subsurface investigation was requested by the RWQCB-LA on February 24, 1989. Mr. James Ross of the RWQCB has been assigned this case, but he has not been available to provide McLaren with a progress update. Since the regional groundwater flow direction is westerly and Calgon vestal is south of the creek, it is not likely any groundwater contaminants from below this site would be transported northwesterly to the Monadnock location.



# **LEGEND**

(4) FACILITY LOCATION: (SEE TABLE 10 FOR DETAIL)





- 51

Table 10

Properties Within One Half Mile Radius of the Monadnock Company

Name	Address	Type of Business	Distance to subject site
1. Bettermade Plastics	730 Epperson Dr.	plastic products (new building)	2,100 feet East
2. World Distribution Systems	18501-18551 E. Arenth Ave.	unknown	1,600 feet Southeast
3. Lithonia West	18401 E. Arenth Ave.	fluorescent lighting fixtures	500 feet Southeast
4. Presto Foods	18275 E. Arenth Ave.	food manufacturing	100 feet West
5. Belwith	18071 E. Arenth Ave.	cabinet hardware, auxiliary home security	1,500 feet West
<ol><li>Wamsutta/Pacific Mills West Coast Distribution Center</li></ol>	18051 E. Arenth Ave.	home furnishing	2,200 feet West
7. Ajax Hardware	825 S. Ajax Ave.	hardware (abandoned facility)	3,200 feet West
8. Creftcon Industries	900 S. Ajax Ave.	conduit fitting	3,000 feet West
9. Hydro-Flight	17939 E. Rowland St.	machined parts	2,600 feet Southwest
10. GE & RCA Distribution Center	18215 E. Rowland St.	home appliances distribution center	1,700 feet Southwest
11. Calgon Vestal Laboratory	18725 E. San Jose Ave.	industrial and institutional cleaning compounds	2,600 feet Southeast
12. Metro Printing	18557 E. Valley Blvd.	printing shop	1,600 feet Northeast
13. Hughes Publication	18541 E. Valley Blvd.	printing shop	1,500 feet Northeast
14. West Coast Samples	18409-18421 E. Valley Blvd.	unknown	600 feet Northeast
15. Terry's Hardware Store	18347 E. Valley Blvd.	hardware store	600 feet North
16. West Coast Transport Refrigeration	18151 E. Valley Blvd.	truck company	900 feet Northwest
17. GTE	18131 E. Valley Blvd.	services division	1,100 feet Northwest
18. La Puente Tire	18121 E. Valley Blvd.	cars service center	1,400 feet Northwest

#### SECTION VI

#### SUMMARY

McLaren collected information pertaining to the site history, past and present use, storage, and disposal of chemicals. This was accomplished by reviewing agency records and aerial photographs, documenting use and location of adjacent properties, interviews with key personnel, and an inspection of the facility.

It was learned that the building was built in 1963 and was first occupied by Academy Ribbon Mills; Cinch-Monadnock occupied the site in 1965 and TRW merged with Cinch-Monadnock in 1969. In 1980, TRW sold the plant to Mr. Miller and the facility became known as the Monadnock Company. In 1987, The Monadnock Company sold all operating assets to HCH Acquisitions, which then changed its name to The Monadnock Company. Mr. Miller retains ownership of the land and the adjacent vacant lot.

Chemical use, storage, and disposal records for the earlier property owners were not available through agencies, but some particulars were recalled by Mr. Miller and Mr. Daunt, key employees at the facility since the late 1960's.

The aerial photograph review indicated that drums had at times been stored in unbermed or uncovered areas. The photographs also indicated apparently moist soil along the southern property boundary in 1968.

The agency record review yielded such records as site plans dating from the early 1960's, building permits, industrial wastewater discharge permits, violations, and inspections, a tank closure report, and previous consultants' reports.

In 1986, soil and groundwater contamination was discovered at the site and was reported to the RWQCB. Since then, several investigations have been conducted to determine the extent of soil contamination, removal of contaminated soil, and aquifer characteristics.

## APPENDIX I

# SITE PLANS

ACADEMY RIBBON MILLS AND CINCH MONADNOCK COMPANY

Academy Ribbon Mill M-1 Plot Plan and Schedule

# OVERSIZE PAGE(S)

See Document # 34208 for fully scanned image(s).

Reduced oversize images may be unreadable. For legible version of oversize document(s), see paper copy.

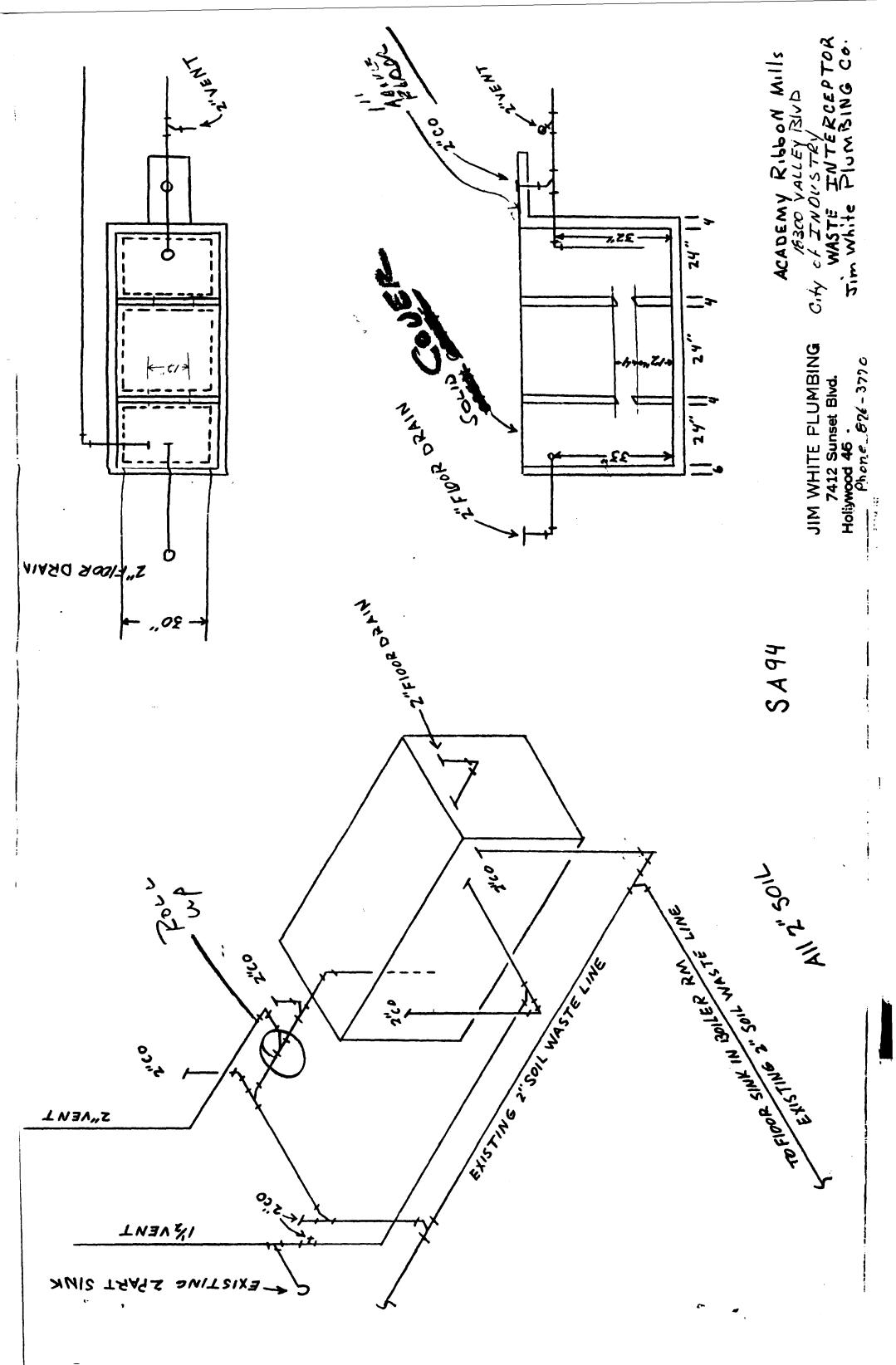
Academy Ribbon Mill M-5 Plumbing plan and details

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Reduced oversize images may be unreadable. For legible version of oversize document(s), see paper copy.

Academy Ribbon Mill Waste Interceptor



Cinch-Monadnock P-1 Plot, roof, plumbing plan and legend

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Reduced oversize images may be unreadable. For legible version of oversize document(s), see paper copy.

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Reduced oversize images may be unreadable. For legible version of oversize document(s), see paper copy.

Cinch-Monadnock P-3 Additions and alterationspartial fire sprinkler and plumbing plan and details

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Cinch-Monadnock P-4 Additions and alterations-Plumbing sections and details

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Cinch-Monadnock P-5 Additions and alterations-Plating line floor plan, legend and details

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Cinch-Monadnock Plating layout

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# APPENDIX II

TANK CLOSURE REPORT



# 00 0.N. X 000 ... 015 ALN G. 3. 2.3.5

# DEPARTMENT OF PUBLIC WORKS

1440 ALCASAR STREET LOS ANGELES, CALIFORNIA 10033 Telephone: (211) 226-8111

MAS A. TIDEMANSON, Divide

February 25, 1988

Mr. Charlie Miller Monadnock Co. 18301 East Arenth Ave. Industry, CA 91749

Dear Mr. Miller:

ADDRESS ALL CORRESPONDENCE TO: P.O. BOX 4019 los angeles, california,2005 (

PH REPLY PLEASE REFERSTO FILE: 1-573

HAZARDOUS MATERIALS UNDERGROUND STORAGE

CLOSURE PERMIT NO. FACILITY LOCATION: 18301 East Arenth Avenue

3724B

This office has reviewed the soil/groundwater assessment report submitted on February 1, 1988 required as a part of the subject closure procedure. Based on the information submitted, we find that:

[XX] The closure is final and no further action is required.

- [ ] The soils removed during the tank excavation are unrestricted and may be used as backfill material. The closure is final and no further action is required.
- [ ] Excavated soils may be a hazardous waste and are not suitable for fill material or disposal on-site. Contaminated soils must be manifested, transported and disposed of pursuant to Chapter 6.5. California Health and Safety Code, unless evidence is presented indicating that disposal is proper at a less restricted facility. Copies of completed manifests or other appropriate evidence indicating legal disposal shall be submitted to this office before this project can be considered closed.
- [ ] The permanent closure of the tank(s) in place shall comply with requirements set by the local Fire Department. Verification must be submitted to this office indicating proper closure and completion of all work.

If you have any questions concerning this matter, please contact Mr. Oscar Enriquez at (213) 226- 4438

Very truly yours,

T. A. TIDEMANSON Director of Public Works

Management Divi

Falcon Environmental

CL204 7/87



RECEIVED

FFB 1 1988

DEPERTMENT OF PUBLIC WORKS ENGINEERING SERVICES DIVIDIO

Mr. Charlie Miller January 25, 1988 Monadnock Company 18301 E. Arenth Ave.

Industry, Ca 91749

Dear Mr. Miller,

Please find the enclosed closure report for the removal of one (1) 1,000 gallon underground storage tank located at 18301 E. Arenth, in Industry, California. This report fulfills the requirements of closure permit number 3724-B

All pertinent documentation and information regarding the work performed is contained in the enclosed report.

The project per contract is considered complete. If you should have any questions, please contact me at (818) 965-0911.

Sincerely,

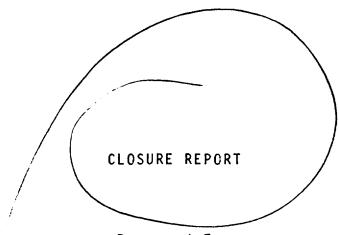
Leigh Ann Cullen

Environmental Specialist

cc: County of Los Angeles

Dept. of Public Works

In Cullen



Prepared For

Monadnock Company Industry, California

Prepared By
Falcon Environmental
January 25, 1988

# Introduction

Monadnock Company, located at 18301 E. Arenth Ave., in Industry, California, maintained one (1) 1,000 gallon underground storage tank on site (see Figure 1).

Falcon Environmental was contracted by Monadnock Company to permanently close all underground storage tanks. Closure procedures involved excavation and removal of the tank, collection and laboratory analysis of soil samples, and the backfilling and resurfacing to grade.

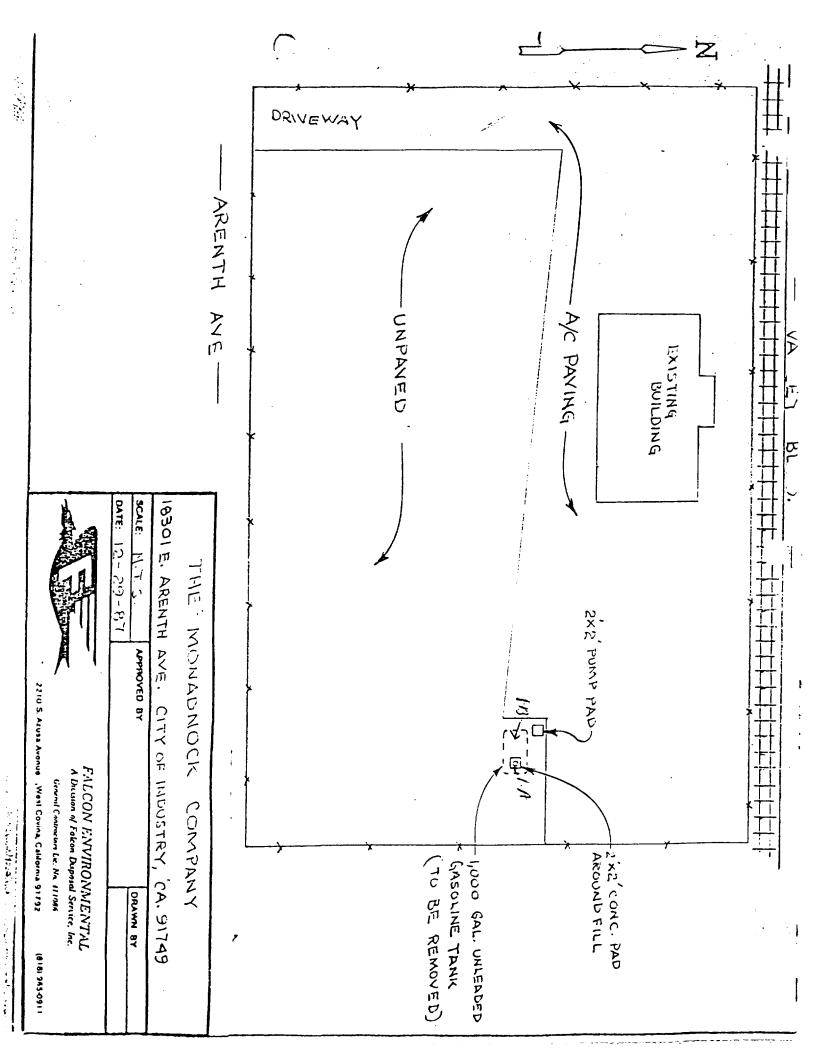
### Tank Closure Procedures

Closure of the tank began on January 11, 1988, the concrete and the soils surrounding the tank was excavated. All excavated soils were stockpiled adjacent to the tank excavation pits. The interior of the tank was rinsed with water to assure that no residue remained. All liquid cleaning wastes were properly manifested and taken to the Demenno/Kerdoon treatment facility in Compton, California, for reclaimation (see Appendix A). The tank was rendered inert using dry ice and certified as noncontaminated in place and then extracted, and disposed of as scrap. ( see Appendix B).

Visual inspection by Falcon personnel immediately following tank removal indicated no visible loss of tank integrity.

A total of two soil samples were collected from the tank excavation pit. One sample each was collected at each end of the tank site at approximately ten (10) feet below grade. No odors were detected in any of the samples collected. No ground water was encountered during the tank removal operation.

The soil samples were packed in sterile 500 milliliter (ml) open mouth glass jars until completely full thereby allowing no headspace. The jars were then sealed with screw-top caps lined with teflon, labeled, and stored in a cooler with ice to maintain laboratory storage temperatures. The samples were analyzed by GEOTEST, a State Certified Laboratory based in Long Beach, California. Chain-of-Custody records were completed for each sample to ensure traceability (see Appendix C).



# Laboratory Results

Laboratory analysis of the soil samples were performed by GEOTEST of Long Beach, California, to determine the historical integrity of the underground tank. Sample number 1A and 2A were analyzed in accordance with EPA Method 8015 for Total Petroleum Hydrocarbons. The results of these analyses and all Chain-of-Custody records can be found in Appendix C.

According to the Los Angeles Department of Public Works the generally accepted action limit of petroleum hydrocarbons in soil is 100 parts per million (ppm).

Sample number 1A exhibited concentrations of 1.8 ppm of petroleum hydrocarbons. Sample number 2A exhibited nondetectable hydrocarbon concentrations. These concentration are well within the limits set by the County of Los Angeles, Department of Public Works.

# Conclusions

The one (1) underground storage tank at Monadnock Company, in Industry, California appear to have suffered no historic loss of integrity. The site was backfilled and resurfaced to grade.



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2	determined to be economically practicable and that I have selected the practicable method of treatree method in the present and thus threat to human health and the environment. OR, if I am a later to minimize my waste generation and select the best waste management method that is avaitable to the present of the present method that is avaitable to the present method that is a value of the present method to the present method to the present method that is a value of the present method that method the present method that method the present method that the present method that method the p	nent, storage, or disposal currently available to its small quantity generator. I have made a good
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### CERTIFICATE OF DESTRUCTION

Date received: January 11, 1988

From: Monadnock Company

18301 E. Arenth Ave. Industry, Ca 91749

TANK ID#

SIZE

0949

1,000 Gallon

Certified by Harbor Testing, Cert. # S 0949

This certifies that the above tank was received certified non-hazardous and safe for hot work (certificate attached) at the Falcon Environmental yard and were converted to scrap by flame cutting.

Don Kazarian President

THOMAS D. BECK & ASSOC, INC.  dba HARBOR TESTING LABORATORY 24 HOUR PHONE (213) 834-5223	MARINE CIE	MIST CERTIFICATE SERIAL NO. S 0949
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QUALIFICATIONS: Transfer of ballast or manipulation of visubject to gas accumulation, unless specifically approved in taffected. All lines, vents, heating coils, valves, and simila designated.	this Certificate, requires inspection and endorsement	or release of Cartificate for the spaces so
STANDARD SAFETY DESIGNATIONS (partial list, paraphrased if SAFE FOR WORKERS; Means that in the compartment or spacthat, (b) toxic materials in the atmosphere are within permissible existing atmospheric conditions while maintained as directed of the standard of the stand	ce so designated: (a) the oxygen content of the atmospile concentrations; and that, (c) the residues are not con the Marine Chemist's Certificate.	here is at least 19.5 percent by volume; and apable of producing toxic materials under
NOT SAFE FOR WORKERS: Means that in the compartment of SAFE FOR HOT WORK; Means that in the compartment so destion of ineried spaces or where external hot work is to be perform the lower flammable limit; and that, (c) the residues are not capa conditions in the presence of fire, and while maintained as directing contained flammable or combustible materials have been cleanly and the compartment works or lube oil tanks or engine room or fire room bilges, have NOT SAFE FOR HOT WORK: Means that in the compartment	signated: (a) oxygen content of the atmosphere is at lead; and that, (b) the concentration of flammable materia able of producing a higher concentration than permitte ed on the Marine Chemist's Certificate; and further, that be asked of fire, or are sufficiently to prevent the spread of fire, or are subsen treated in accordance with the Marine Chemist'	ist 19.5 percent by volume, with the excep- is in the atmosphere is below 10 percent of d by (b) above under existing atmospheric t, (d) all adjacent spaces containing or hav- atisfactorily inerted, or, in the case of fuel a requirements:
CHEMIST'S ENDORSEMENT. This is to certify that I have person of Gas Hazards on Vessels and have found the condition of each the undersigned acknowledges receipt of this Certificate under Section 23 of a understands conditions and limitations under which it was issued.	to be in accordance with its assigned designation.  NFPA 305 1980 This Certificate is based on conditions.	In accordance with NFPA 306-1980 Control is the time the inspecting herein and forth was lighted with all qualifications and instructions.
land Buby Gnes FALCON	J—/3-89 Signed / Date Spring	WININIA SAY

APPENDIX C



# **GEOTEST**

An Environmental Monifoling and Testing Service

### LABORATORY RESULTS REPORT

PREPARED FOR

FALCON ENVIRONMENTAL MANADONOCK 18301 E. ARENTH INDUSTRY, CALIFORNIA

# ANALYSIS OF HYDROCARBON CONTENT BY GAS CHROMATOGRAPHY MODIFIED EPA METHOD 8015

DATE RECEIVED
DATE OF ANALYSIS

JANUARY 12, 1988 JANUARY 14, 1988

PROJECT NUMBER

88501-95

SAMPLE ID #	<u>CONCENTRATION</u> (mg/kg)
1A	1.8
2A	ND,<1.0

Analyst:LND

Reviewed & Approved

\*NOTE: Samples were received in a chilled state, intact and with Chain-of-Custody attached.



18' Obispo Avenue, Suite A Li Jeach, California 90804 Telephone: (213) 498-9515

### **CHAIN-OF-CUSTODY RECORD**

PROJECT NO: 28501-9

DATE ///2/5'5- PAGE / OF /

PROJECT NAME MORNINGER						METHODS								ERS	
SAMPLERS (SIGNATUR LABORATORY SAMPLE NO.	PETROLEUM HYDROCARBONS 8015	PETROLEUM HYDROCARBONS 418.1	BTXE (8020/602)	CAC METALS	HALOGENATED VOLATILE ORGANICS 8010						NUMBER OF CONTAINERS	COMMENTS/ CONTAINER TYPE			
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SIGNATURE	May 1	1/12	SIGNATURE			SIGN	ATURE	. <del></del>	,		•				SAMPLE CONDITIONS
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# APPENDIX III

CORRESPONDENCE WITH AND FROM
THE LOS ANGELES COUNTY SANITATION DISTRICT REGARDING
PERMIT REQUIREMENTS, EFFLUENT DATA
AND LETTERS OF WARNING

Heavy Mills F.

### COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

Industrial Vastes - Grab Samples

April 8, 1971

To Determine Mature of Plating Westes

AFE-WO: 330

Requested by J. Erener Copy: E. Payne

•			•
CONSTITUENT	Stabile Plating Company	Cinch Modmork Company	Thompson 457 Plating Lilians Company France
pill	7.7	10.6	••
Cyanide, mg/l CR	0.133	460	30.3
Cadmium, mg/1 Cd	0.05	1.86	100°
Copper, mg/l Cu	0.29	0.15	-
Wickel, mg/l Wi	1.68	0.22	_

\*not enough sample for analysis

Work performed at: Central Laboratory, County Sanitation Bistric of Los Angeles County.

CINCH - MONADWOCK

Industrial Waste - Orab Sample

January 11, 1972

To Determine Strength of Industrial Weste

AFE-WO: 1829-625

Requested by: Copy:

J. Kilne"

E. Burr E. Paymo

- <u>- .</u> **L** 

CONSTITUENT	Maste	
p#	(3.00)	
Suspended Solids, mg/l	13	١
Dissolved Solids, mg/l	1,017	
Total Solids, mg/l	1,090	
Total Alkalinity, mg/1 CoCO,	•	
Bicarbonate Alkalinity, mg/1 CaCO.	•	
Carbonate Alkalinity, mg/1 CaCCa	•	
Hydroxide Alkalinity, mg/l CaCO.	0	
Cyanide, mg/l CH	8.00	
Cadmium, mg/l C4	2.76	
Total Chromium, mg/l Cr	0.07	
Hexavalent Chromium, mg/l Cr	0.00	
Copper, mg/l Cu	0.11	
Iron, mg/l Pe	1.92	
Load, mg/l Po	0.10	
Mickel, mg/l Hi	0.00	
Zine, mg/l Zn	0.30	
Conductance, µmho/cm	1,800	
Total COD, mg/1 0	17	

Work performed at: San Jose Creek Water Quality Laboratory, County Sanitation Districts of Los Angeles County

APPLICATION NO. EXISTIN	IQ INDUSTRY	750
PERMIT FOR INDUSTRIA	LEWASTEWATER DISCHARGE	Þ 32
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*APPLICATION IS HEREBY MADE BY* THE THE CUICE MONA!	POCK PIVISION	
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Date , July 25ml		▼
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Signature for Applicant CHARLES M MITTLES (MANE) Appropriate Charles County Official (MANE) Appropriate Charles County Official (MANE)  Appropriate Charles County Official (MANE)  Color Dept. of County Engaging (MANE)  City of Charles (MANE)	Approved by September Districts of C	Post None  Appris Conty  75  d Ground Strager
Signature for Applicant CHARLES M MITTER COMPANY ADMINISTRATIVE OFFICIAL (MANE) Appropriate Ching County Observation Discharge Date 1000 City Service For Dest. of County Engaging 4	Approved by September Districts of C	75 Renes
Signature for Applicate CHARLES IN MITTER  (COMPANY ADMINISTRATIVE OFFICIAL) (NAME)  Appropriate China Charles Charles Charles  (Company of County Officer Charles  (City of Charles Charles Charles Cha	Approved by September Districts of C	Renes Engl

RETURN THIS COPY TO APPLICANT WHEN APPROVED

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### SANITATION DISTRICTS OF LOS AMGELES COUNTY INDUSTRIAL WASTEWATER CRITICAL PARAMETER REPORT FORM

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# ADDITIONAL INFORMATION QUESTIONNAIRE FOR PERMIT APPLICANTS

A STATE OF THE STA

SANITATION DISTRICTS OF LOS ANGELES COUNTY 1955 Workman Mill Rd., P.O. Bex 4998, Whittier, CA. 90697 John D. Parthurst, Chief Engineer and General Manager Application Bo. E64415

-	City	of Inde	et17_	, Calif	7	/28	124
Name of Company	ADMOCK J	PITILION		\$.1.0	C. No	3471.	<u> </u>
Mailing Address 18301 8 Arenth Ave				dustry.	CA 91	747	
Polet (greet)			77,	(97492)			
Address of Wasteweter Discharge18301			City_of	Infustr	L_CA_	71747	
Legal Address 82 4 0 1		<u> P</u>		Application	Ne	14415	
IF YOUR COMPANY DISCHARGES OR WILL Distant below, please check the appropriate box		E TO THE	SEWER	any of the	waster	edar car	
1. Flammable wastes (406A)	0	9. Cy	anida wa	otes (406J)	)		~~
2. Taxic or paleanous wastes (4068)	O			ved solids	ebove		
3. Acidic meterials (pH less than 6.0) (4060	2 <u>7</u> 0		00 mg/1		*****		
4. Materials that could obstruct the	0			CUS WE THE			
sever (4060) S. Rainwater (406E)	_		sic mate	ulfidas ava	OT M	\1 ( <del>a</del> n	PO_ C
6. Dilution water (406F)	8			Den 10.5	(4060)		-
7. Petroleum based soluble	H		nic ghose		(	,	
cutting oils (406G)	U			e over 120	F. (40	60)	Č
8. Any quantities of petroleum based ells (406H)		16. Hij	this colo	red westes	(40 <b>6</b> V)	- •	č
17. Wastes larger than %" in any dimension				*			
<ol> <li>Any arsenic, boron, cadmium, chramium, zinc, or other toxic meteriels (406X)</li> </ol>	copper,	lood, merci	ury, nich	d, <del>seleniu</del> r	, silver,	tia,	\d
<ol><li>Blow down or bleed weter from cooling to</li></ol>	wers, boi	pers or evel	parative (	coalers (40	<b>67)</b>		
20. Single pass cooling water (4062)							֓֞֞֞֞֞֝֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞֞
21. Radioactive materials (406AA)							
22. Recognizable portions of the human anal							C
NOTE: Numbers in perentheses refer to Districts' Industrial Waste Ordinar		your sca	M 0 94	•			
IF YOUR COMPANY HAS ANY OR WILL HAVI for westewater priza to disposal to the sawer,					MENT S	YSTEMS	<b>.</b>
1. Interceptor, clarifies sump or trap	~8		enide des				70
2. Screen or filter		II. O	ramium (	reduction ,	4		ō
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L. Cyclone	▣			made in			7
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8. Acid or base neutralization 9. Chemical congulation or precipitation	H						<u> </u>
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I hereby affirm that all information furnished	is true on	ed correct t	o the bed	at of my lon	angboluc.		
-	_			-	•		
Date July 22ml 19 74	_ ^	`AA`	11				



# COUNTY SANITATION DISTRICT OF LOS ANGELES COUNTY

1955 Workman Mill Boad / Whiteler, California Mailing Address: / P. O. Box 4998, Whitter, California 90607 Telephone: (213) 699-7411 / From Los Angelos (213) 685-5217

JOHN B. PARDS

(選講職)地上帝

October 14, 1975

In reply, please refer to File:21-00.05-00/75-3587

City of Industry 255 North Haciende Blud. Industry, California 91744

Attention: E. J. Epperson

Subject: Industrial Wastewater Discharge Permit No. 3287

**5** :

TRW Inc. Cinch Monadock Division 18301 East Arenth Avenue Industry, California 91747

Dear Mr. Epperson:

Enclosed are four (4) approved sets of plans and copies of the approved Industrial Mastewater Discharge Permit for the wastewater discharge from subject company. Please review these for compliance with your requirements, retain the copies you require for your files, and return the applicant's capies and any spare sets of plans to the applicant. The approved plans compiet of:

1) Sheet 1 - Plot Plan

2) Sheet 2 - First Floor Plan with a Butgil of the Clarifier

Approval of the plans and permit is contingent upon continuing compliance with applicable Sanitation Districts' Ordinance requirements, / upon corrections shown in red on the drawings, and / X/ upon the items indicated on the attached requirement list.

If you have any questions concerning the requirements, please contact the Sanitation Districts' Industrial Naste Section at extension 284.

Yery truly yours,

John D. Perkhurst Chief Engineer and General Manager

Leslie D. Rose

Industrial Waste Engineer

LDR:JS:gkb cc:TRV, Inc. 18301 E. Arenth Ave. Industry, CA 91747

Attn: Charles H. Miller, General Henager

Encls.\*

# SANITATION DISTRICTS OF LOS ANGELES COUNTY INDUSTRIAL MASTE SECTION REQUIRED MASTEWATER CHARACTERIZATION TESTS

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AND THE CO.

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Fira	Marse Ti	W. Inc. Cinch Honecoock Divi	sion		Pe	reit No. 3257	
Mer	ess of Pro .cing Wes	operty 1830) F. Arenth Ave				Date October	4. 1975
	erge	Industry, California 9	1747			S.1.C. No36	<u>n</u>
frequ	ency of i	Analyses 1 per 3 mont	hs		<u></u>	2.6 Million	
which izati they	noust be ion tests	analyses and flow measuremer n Districts on the Districts' signed by an administrative may be deleted from future r very minute amounts in the w mater.	offi repor	cer of th	e company. can be de	Certain request constrated in ur	ied chare Iting the
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- Companies required to submit only annual characterization analysis data should main't it directly to the Districts on July 1; companies required to submit data every 6 months should submit data on January 1, and July 1; companies required to submit data every 3 months should submit data on January 1, April 1, July 1, and October 1. Required industrial wastewater characterization analysis data not received within 45 days of the required date will be considered delinquent and a possible cause for revocation of the Industrial Wastewater Discharge Permit.
- 2/ Total Flow and maximum 30-minute peak flow rate for the day when composite characterization sample is taken.
- It is the responsibility of the subject company to report analyses of any other toxic raterials shown on the Critical Parameter Report Form, which are known to be present in the wastewater, or may occur in the wastewater as a result of a process change.

# SANITATION DISTRICTS OF LOS ANGELES COUNTY TABLE OF SURCHARGE TEST FREDWENCY

YEARLY CURU	LATIVE FLOW	Required Frequency of Tests for Surcharge Parameters					
Million Gallons	Million Cubic Feet	(Critical Parameters A. (Flow, Peak Flow, COO and Suspen	B, C, D) 1/				
Less then 6.0	Less them 0.80	<i>:</i> •	¥				
6.0 to 15.0	0.80 to 2.00	1 per 6 Reaths					
15.0 to 36.0	2.00 to 4.80	- 1 per 3 Reetle	***				
36.0 to 250	. 4.80 to 33.33	1 per Reeth .	<b>.</b>				
Over 250	Over 13.33	1 per Heek					

### MES:

- 1/ Companies having peak flows of 100 gallons per minute or more or total flows of \$8,6 gallons per working day or more must provide a continuous automatic indicating, total izing and recording of total industrial wastewater flows discharged.
- 2/ Companies with cumulative yearly flows less than 6.0 million gallons may determine surcharge parameters for use in the "Long Form" Surcharge Statement or may pay for discharge at the current flat rate charge per million gallons used in the "Short Form" Surcharge Statement and not test for surcharge parameters. At least two determinations of the surcharge parameters must be made to furnish data for use in the "Long Form" Surcharge Statement.
- 3/ The frequency of tests specified in this trble becomes effective on July 1, 1994 for the subsequent fiscal year.

# SANITATION DISTRICTS OF LOS ANGELES CONTY MOUSTRIAL WASTEWATER CRITICAL PARAMETER REPORT FORM

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John D. Parkhurst, Chief Engineer and General Manager 1955 Workman Hill Road, P. O. Box 4998, Whittier, California 80607

# INDUSTRIAL WASTEWATER DISCHARGE PENVIT

# REQUIREMENT LIST

COMPANY NAME TRW, Inc. Cinch Honadnock Division	
INDUSTRIAL WASTEWATER DISCHARGE PERMIT NO. 3287	
DATE OF PERMIT ISSUANCE October 14, 1975	
The above named company is required to comply with all indicated items on the list as a condition of the permit approval. Satisfactory evidence of compliance with these conditions should be supplied to the Sanitation Districts where requestains factory evidence will consist of a minimum of written notification signed by responsible company official, and in some cases may involve the submission of additional drawings and data.	
1. Surcharge tests of the industrial wastmeter must be performed at the intervals indicated on the enclosed Table of Surcharge Test Frequency and submitted annually with the westmeter treatment surcharge statement.	<b>7</b>
2. Characterization tests of the industrial westmeter must be performed at the intervals indicated on the Required Characterization Tests form and reported on the enclosed Critical Parameter Report Form. All indicated analyses should be performed by a state of California or Sanitation Districts' approved laboratory. Revision of the Required Characterization Tests may be considered after initial analyses and upon written request with valid supporting information from the subject company. It is the responsibility of the subject company to report analyses of any other toxic materials shown in the Critical Parameter List, which are known to be present in the wastmater.	9
3: The amount of oil and grease present in your wastameter is considered excessive for a discharge to the public sense.  A program of regular interceptor cleanout should be adopted to prevent the build-up of oil and grease which may enter the sener.	<del>7</del>
4. Any rainwater discharge to the sanitary and industrial sewer system must be in accordance with the Districts' policy on rainwater, enclosed.	<b>7</b>

 Rainwater diversion systems shall divert any rainfall in excess of 0.1 inch to the storm sower. Diverted rainwater must meet any requirements of the Regional Mater Quality Control Board.

THE CONTRACTOR OF

- 6. The pH of the wastewater must be maintained above 6.8 at all times. Proper neutralization procedures must be observed to assure that this limit is not exceeded. Batch neutralization is required for any tanks containing acidic solutions before they are discharged to the sever, if the solution pH is less than 6.0.
- 7. An automatic continuous pH recording instrument must be installed to monitor the pH of the wastemater discharge stream entering the public sever. The probe for the pH instrument must be located downstream of any pretreatment operations or of any branches which may be a source of industrial wastewater. The pH equipment must be regularly calibrated and maintained in good working order. At least 180 days of pH records must be filed at the discharge address and must be made available for inspection by representatives of the Sanitation Districts at any time during business hours. If pH records indicate periods of acidic or highly alkaline discharge, the applicant may be required to install a pH controlled neutralization system.
- 8. An automatic effluent pH recording and central system is required to regulate the neutralization of wastemater. Prior to installation, plans and supporting information for the pH neutralization system must be submitted to the Districts for approval. The plans must indicate design flow rates and the chemical nature and concentration of acidic or alkaline materials to be neutralized. The composition and stored volume of neutralizing agent should be indicated as well as the design flow rate for its injection into the waste stream. Plans must show the dimensions and volume of the neutralization chamber, means and power of agitation, the location and function of all pH probes and other instrumentation.
- 9. Numerical limits have been established by the Sanitation Districts for the maximum concentrations of heavy metals, and other texte materials, permissible in an industrial discharge to the public severs. The limits are those shown in the enclosed table of "INDUSTRIAL MASTEWATER EFFLUENT LIMITATIONS." The subject company is advised that any discharge in excess of these limits requires corrective action by the discharger. Penalties applicable to violations of these limits will be strictly enforced by the Sanitation Districts beginning on January 1, 1977.

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 All wastewater discharged to the sever must have a temperature lower than 120 F.

11. A11	industri	al waster	ater disc milligram	verged to	the sever	met
. not	contain	over 0.1	milligram/	liter of	dissolved	sulfides.

- 12. One-pass cooling water must not be discharged to the sewer system. Plans or other information which describe a method for reuse, recirculation or an alternate means of disposal of the one-pass cooling water must be provided.
- 13. All floor drains located in processing areas, or other areas where oil or grit may enter the samer must be routed through a gravity separation interceptor. The interceptor shall provide a 30-minute detention time based on the peak wastewater discharge rate, with a minimum capacity of too gallons, and shall be baffled to retain floatable oils and greases, as well as settleable grit materials.
- 14. Any proposed revisions which result in a significant change in wastewater quantity or quality (approximately 25% or more or 25,000 gallans per day) from the values reported in the permit application will require a new permit application to be submitted for the Bistricts' approval.
- 15. Waste haulers reports must be obtained and hapt on file for a period of at least 180 days for any liquid ungles leaving the plant other than in the sour system. These reports must be made available to representatives of the Sanitation Districts upon request.
- 16. For any industrial westmeter discharge of \$0,000 gellens per day, or 100 gellons per minute peak flow, or greater, an automatic full-time total flow measurement system 18 required. Detailed construction drawings for the required automatic continuous recording and totalizing flow matering installation must be submitted. These drawings shall indicate pipe slopes, elevation, locations and relevant disensions: types and locations of instrumentation; the estimated flow range (minimum, maximum and average); and upstream and downstream piping, structures and device which could influence flow through the meter. In addition, engineering calculations shall be supplied where unusual flow conditions exist and/or the proposed installation differe from published standards. Manufacturer's data sheets shall be included with the construction drawings for all manufacture equipment to be installed as part of the flow metering system.
  All electrical equipment and wiring to be installed in comminication with vapor space of the public sever shall be suitable for Class I, Group D. Division I, hazardous location es specified in Articles 500-517 of the National Electrical Code. Such electrical equipment and wiring shall be of explosion proof construction, or alternately, may be certified to be intrinsically safe by a nationally recognized testing laboratory, such as Underwriters Laboratories, Inc. or Factory Mutual Engineering Corporation. Design of pretreatment systems and flow metering installations shall be performed under the supervision of a

California registered professional engineer competent in this field. Design and construction drawings and calculations shall be stamped with the authorized seal of the supervising professional engineer, or signed over his registration number, to indicate his review and approval of the work.

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- 4 -

- 17. The flow meter shall incorporate a contact closure pulse signal which can be used to activate an automatic sampling device at uniform intervals of metered volume. The device must be capable of generating one to four pulse signals for each flow volume equivalent to 30 minutes at the average flow rate during the operating day of the facility. The control signal shall be fed to an MS 3102E 18-10S socket with a MS 25043-148D cap and chain or their equivalent. These articles are manufactured by Amphenol, Bendix, and Cannon. The contact signal shall be connected to pins A and B or 1 and 2 (whichever is applycable) of the socket. The socket shall be mounted in a suitable weatherproof receptacle best and legated as close as possible to the sampling point.
- 18. An industrial wastewater sampling point(s), softable for obtaining grab or continuous samples, must be provided and its location clearly indicated to the Districts. The sampling point must be located downstream of all sources of industrial wastewater and of any gravity separation interceptor or other pretreatment equipment. Safe and convenient access to the sampling point must be provided for representatives of the Sanitation Districts. Where practical, access to the sampling point shall be available from the public street, but the sampling point shall not be in any membels located in the street. If a locked security enclosure is necessary, the Sanitation Districts shall be provided with two boys or the lock combination, or a Districts' padlock shall be used to secure the sampling point area.
- 19. Information requested, or satisfactory evidence of compliance cust be submitted to the Sanitation Districts within to satisfy condition manhor(s)
- 20. The permittee is required to continue the regular clarifier maintenance and cleening at intervals frequent enough to prevent a build-up of grit, oil, or grease which may enter the source.
- 21. The Sanitation Districts' Ordinance requires that all floor drains located in industrial areas, or other areas where eil or grit may enter the sever must be routed through a gravity separation interceptor. TRM Inc. Cinch Honadnock Div. may be required to install an additional interceptor if inspection indicates prohibited materials are discharged.

In order to protect the Sanitation Districts' biological In order to protect the Sanitation Districts' biological treatment plants, and the environment, concentrated solutions of toxic plating compounds may not be drained to the sever system. Certain plating solutions have salvage value and may be disposed of by selling them to a heavy metal reclaiming company. If it becomes necessary to dispose of any toxic solutions, which cannot be reclaimed, they should be hauled to a Class I landfill approved by the Regional Mater Quality Control Board or other legal disposal facility. If additional information is desired on methods of disposal of toxic solutions, please contact John Eason at extension 27th. solutions, please contact John Eason at extension 278. From the information provided by the subject company. following tanks must not be drained to the source

Tank No's. 1, 7, 8, 9, 12, and 13

and any other etching or stripping tanks contains concessive beauty metals.



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## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Boad / Whitter, California Mailing Address: / P. O. Box 4998, Whitter, California 90607 Telephone: (213) 699-7411 / Fram Las Angeles (213) 685-5217

JOHN D. PARCHIEST Chief Engineer and General Manager

October 27, 1975

TM, Inc. Cinch Honodrack Div. 18301 E. Arenth Ave. Industry, California 91747

Subject: Discharge of Wastewater in Excess of Phase I Effluent Limitations

Re: Industrial Maximater Discharge Permit No. 3257

#### Bear Stra:

The Sanitation Districts of Los Angeles County adopted on July 1, 1976, Phase I effluent limits for certain industrial wastewater constituents, copy attached. These limits will be strictly enforced effective Jamery 1, 1977. The eighteen-south compliance period was established by the Districts to allow companies not now meeting the limits to make any necessary corrections.

Analyses recently performed by the Districts on a sample of your unstancter taken on July 1, 1975 , indicates that you are not meeting the Phase I effluent limits for those wastewater constituents underlined in red on the attached copy of the limits. Your company is required to submit to the Districts within 90 days of the date of this letter, a plan with an implementation schedule for control of the discharge of these wastewater constituents.

It is important that companies such as yours control the discharge of these constituents, as the ultimate limits which the Districts will establish for your industry will be affected by the degree of pollutant reduction accomplished by the Phase I control program. An explanation of the Phase I control procedures is attached for your information.

If you have any questions please call John Eason at extension 278.

Yery truly yours,

John D. Partherst Chief Engineer and General Hanager

Jay G. Frener
Kead, Industrial Muste Section

JCK: JEE:

Enclosures: \* Phase I Limits

\*\* Definition of Required Phase I Controls

\*\*\* Suggested Suidelines for Meeting Phase I Controls

# SANITATION DISTRICTS OF LOS ANGELES COUNTY INDUSTRIAL WASTEWATER EFFLUENT LIMITATIONS FOR JOINT OUTFALL DISTRICTS

40,000,000

The state of the s

	Industrial Wastewater Effluent Limitations
Constituent	Phase I Control Period
	(mg/l)
Arsesic	3
Cadmium	15
Chronium (Total)	10
Copper	15
lood	•
Morcury	2
Michel	12
Silver	\$
line	25
Cyanide (Total)	10
Total Identifiable Chlorinated Bydrocarbons	Essentially Wome





## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Wersman von Bood i Whittler, Colliente Waling Azdress / P. O. Gos 4998, Whittler, Californ's 90007 Telephone 12: 3: 679 7411 / From Lee Angeres (213: 985-5217

JOHN D. PARIDLEST Chief Engineer and General Managur

March 8, 1976

File: 21-00.05-00/76-3287

THE Cinch-Honednock 18301 B. Arenth Ave. City of Industry, Ch. 91749

Attention: Mr. J. A. Dount

Subject: Industrial Wastewater Discharge Permit No. 3287

Dear Mr. Deant :

In response to your letter dated January 27, 1976, the besic concept of the three step approach described for controlling cadmins and cyanide in your wastewater appears acceptable to the Districts. The technology for cyanide destruction by hypochlorite is well decomented, and has been used with success in numerous installations within the Districts.

Prior to installation, construction drawings and memufacturers' literature of the proposed system should be submitted to the Districts for comments. An implementation schedule should be included, which would allow for the system being operational prior to January 1, 1977.

It is cautioned that your existing settling facilities may not be adequate for the removal of cadmium hydroxide from the wastemater. A settleability study should be performed on your wastewater to . determine if a more sophisticated solid-liquid separation device, such as centrifugation, filtration or a tubesettler, is required.

A pauphlet describing low interest pollution control financing available through the California Pollution Control Financing Authority is enclosed for your information.

Very truly yours,

John D. Parkhurst Chief Engineer and General Manager

Jay 6. Kremer

Bead, Industrial Waste Section

JUK: JEB:ct

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	Time and	pe <u>2. Composite, Indus</u> Date	Tribl Has	yeasin	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1				
		1830-625	Requested by: Jay Kremer						
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1	Labora	tory Job Number Volume	\$J07=10	\$J0	SJO	SJO	SIO		
		_	24 000						
		nstituent	a-						
	pH Suspende	d Solids, mg/l	3.9				<del> </del>		
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	Volatile	Suspended Solids, mg/l							
		kalinity, mg/l CaCO <sub>1</sub> ate Alk, mg/l CaCO <sub>3</sub>							
		e Alk, mg/l CaCO <sub>1</sub> e Alk, mg/l CaCO <sub>2</sub>							
	Chloride	, mg/1 C1							
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		lfide, mg/l 8 Sulfide, mg/l 5				<u> </u>	<del> </del>		
	Nitrate	Nitrogen, mg/1 M							
•	Ammonia	Nitrogen, mg/l N							
		Nitrogen, mg/l N cosphate, mg/l PO4							
	Ortho Ph	osphate, mg/l PO4							
	Total Cy	anide, mg/l CM	36.4						
	Total He	rdness, mg/l CaCO3							
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	Arsenic	ng/l As rium, mg/l Ba							
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	Total Co	opper, mg/l Ca							
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	Oal and	Grease, mg/I			<del>                                     </del>	<b></b>			
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	Sodium	Adsorption Ratio			<u> </u>				
					<u> </u>		<u> </u>		

Hork performed at: San Jose Creek Water Quality Laboratory, County 11/75 Sanitation Districts of Los Angeles County

Location 10000 /2/1000	111	; <u>.                                    </u>						
Sample Type - /- Composite, Industrial Waste								
Time and Date 19-20 % /	7-21-1	4						
AFE-WO: 1830-625			Jay	Kremer				
Copy: Kremer, Maguin, Ro	 se	_						
	SJ0 5 55.	SJO	SJO	012	S.10			
Sample Volume	سرر د							
Constituent	24 hb Campo							
	14							
/ pH	1/:,-							
/ Suspended Solids, mg/l Dissolved Solids, mg/l	57							
(Total Solids, mg/1								
Volatile Suspended Solids, mg/l Total Alkalinity, mg/l CaCO <sub>3</sub>								
Bicarbonate Alk, mg/L CaCO3					•			
Carbonate Alk, mg/1 CaCO <sub>3</sub> Bydroxide Alk, mg/1 CaCO <sub>3</sub>	<b></b>							
Chloride, mg/l Cl				•				
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Soluble Sulfide, mg/1 5								
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Ammonia Nitrogen, mg/l N								
Organic Nitrogen, mg/l N Total Phosphate, mg/l PO4	<del> </del>							
Ortho Phosphate, mg/1 PO4								
Pluoride, mg/l P	19.2							
/Total Cvanide, mg/1 CM  Thiocyanate, mg/1 SCM	17.6							
Total Hardness, mq/1 CaCO3								
Calcium Hardness, mg/l CaCO; Hagnesium Hardness, mg/l CaCO;					<u> </u>			
Arsenic, mg/l As								
Total Barium, mg/l Ba								
/Total Caimium, mg/1 Cd	13.2							
Total Chromium, mg/l Cr   Hexavalent Chromium, mg/l Cr	<del> </del>							
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Total Copper, mg/1 Ca								
Total Iron, mg/l Pe Total Lead, mg/l Pb	<u> </u>							
Total Lithium, mg/l Li								
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Work performed at: San Jose Creek Water Quality Laboratory, County Sanitation Districts of Los Angeles County

L XIV 11/75

Sample	Type Composite, Indus	trial Was	te			
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Total	Alkalinity, mq/I CaCO3					
Bicarb	onate Alk, mg/l CaCO3 ate Alk, mg/l CaCO3					
Hydrox	ide Alk, Eg/l CaCO3					
Chlori	de, mg/l Cl					
Thiosy	e, mg/1 SO <sub>4</sub> lfate, mg/1 S <sub>2</sub> O <sub>3</sub>	<b></b>			ļ	
Total	Sulfide, mg/l S					
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Nitrit	e Nitrogen, Eg/l N					
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Total	Phosphate, mg/1 PO4					<del></del>
Ortho	Phosphate, mg/1 PO4					
L 70tal	de, mg/l P Cyanide, mg/l CM	137)		l		<b></b> -
Thiory	anate, mg/l SCN					
Calciu	Hardness, mg/l CaCO3 m Hardness, mg/l CaCO3					
Magnes	ium Hardness, mg/l CaCO2					
Arseni	c, mg/l As Barium, mg/l Ba					
Total	Boron, mg/1 B					<del>                                     </del>
	Cadmium, mg/l Cd	10.6				
	Chromium, mg/l Cr lent Chromium, mg/l Cr	0.48				<del>                                     </del>
Total	Cobalt, mg/1 Co					
	Copper, mg/l Cu Iron, mg/l Fe					
Total	Lead, mg/l Pb					
Total	Lithium, mg/l Li Manganese, mg/l Hn					
	Mercury, mg/l Mg					
Total	Nickel, mg/l Ni					
Total	ium, mg/l K Selenium, mg/l Se					<del> </del>
Total	Silica, mg/l 5102					
Total	Silver, mg/l Ag , mg/l Na					
Total	Zinc, mg/l 2n					
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Work performed at: San Jose Creek Water Quality Laboratory, County

1/75 Sanitation Districts of Los Angeles County

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	Total Solids, mg/l					
	Volatile Suspended Solids, mg/l					
	Total Alkalinity, mg/1 CaCO2			<u> </u>	<u> </u>	↓
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	Thiosulfate, mg/l 5201					
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	Organic Nitrogen, mg/1 N					
	Total Phosphate, mg/1 PO4			ļ	ļ	
	Ortho Phosphate, mg/1 PO4			<del></del>	<del></del>	<del> </del>
$\exists$	Pluoride, mg/l F Total Cyanide, mg/l CN	10.01		<del> </del>	<del> </del>	<del> </del>
4	Thiocyanate, mg/1 5CN			<u> </u>		
	Total Hardness, mg/l CaCO3					
	Calcium Hardness, mg/1 CaCO3				1	
	Magnesium Hardness, mg/l CaCO;			<del> </del>	<del> </del>	<del> </del>
-	Arsenic, mg/l As Total Barium, mg/l Ba			<del>{</del>	<del> </del>	<del> </del>
-	Total Boron, mg/1 B			<del> </del>	<del> </del> -	<del> </del>
7	Total Cadmium, mg/1 Cd	4.04				
_ 1	Total Chromium, mg/1 Cr					
	Hexavalent Chromium, mg/l Cr			<del> </del>	<del> </del>	<b></b>
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ᅱ	Total Copper, mg/l Cu Total Iron, mg/l Fe				†	
	Total Lead, mg/l Pb					
	Total Lithium, mg/1 Li					
	Total Manganese, mg/l Hn			<u> </u>	<b></b>	
_]	Total Mercury, mg/1 Hg			<del> </del>	<del> </del>	<del> </del>
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	Total Silica, mg/l SiO2					
	Total Silver, mg/l Ag				{	<u> </u>
	Sodium, mg/l Na			<del> </del>		<del></del>
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7	Conductance, umho/cm Total COD, mg/1 0	30				
	Soluble COD. mg/1 0					
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	Total Phenois, mg/l Cancon 1			<del> </del>	ļ	<b></b>
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A XIV 11/75 Sanitation Districts of Los Angeles County



## DOUNTY SANITATION DISTRICTS OF LUS ANGELES COUNT

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1993 - Gerge Meiser, Whiteler, California 1971 - Approxy 1972, Box 1<mark>998, Whiteler, California</mark> Colonia Telepointe 1972 - Paris Francis Anglico (1971 - 1972)

ICHN 9, PARTICIES
C-uf Engineer and General Manage

Jul: 30, 1976

File: 21-00.05-00/76-3

Cinch-Monadnock 18301 E. Arenth Industry, CA 91749

Subject: . Discharge of Wastewater in Excess of Phase I Effluent Limitations

Re: Industrial Wastewater Discharge Powrit No. 3287

Deer Mr. Charles Miller:

The Sanitation Districts of Los Angeles County adopted an July 1, 1975, Phase I effluent limits for certain industrial unstameter constituents, copy attached. These limits will be strictly enforced effective January 1, 1977. The eighteen-month compliance period was established by the Districts to allow companies not now mueting the limits to make any necessary corrections.

Analyses recently performed by the Districts on a sample of your wastewater taken on June 16 & 17, 1976 , indicates that you are not meeting the Phase I effluent limits for those wastemater constituents underlined in red on the attached copy of the limits. The analyzed value for each constituent found in violation is listed in the right-hand column. Your company is required to submit to the Districts within 45 days of the date of this letter, a plan with an implementation schedule for control of the discharge of these wastewater constituents.

It is important that companies such as yours control the discharge of these constituents, as the ultimate limits which the Districts will establish for your industry will be affected by the degree of pollutant reduction accomplished by the Phase I control program. An explanation of the Phase I control procedures is attached for your information. Your company must be in compliance of these Phase I limits by Jamery 1, 1977 or enforcement actions will ensue.

if you have any questions please call John Eason at extension 278.

Very truly yours.

Jay G. Kremer

John D. Perkhurst Chief Engineer and General Hanager

Head, Industrial Waste Section

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JEK: JEE: Ct

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CA . : 164

Enclosures: \*Phase I Limits

\*\*Definition of Required Phase I Controls

\*\*\*Suggested Guidelines for Meeting Phase I Controls

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### TRW.cmch-monadnock

· 李音音

September 23, 1976

Mr. John D. Parkinerst Chief Engineer County Somitation Districts of Lee Angeles County P. O. Ben 4998 Whittier, CA 90607

> Re: Industrial Wastewater Discharge Permit No. 3287 File: 21-00.05-00/76-3287

Dear Mr. Parkharet ( July 30)

Re your recent letter in which you pointed out that a sample of our wastewater did not meet the Phase I officent limits for Cyanide, we have taken steps to rectify the condition on a temperary basis.

It order to lower the Mg/l from 13.7 to under 10.0, we increased the amount of Chlorine at the Cyanide rinse tank.

We found this method to work successfully on a short-term basis emegt on the rare occasions when we have a high acid content in our tanks and destroy seems of the Chlorine.

We are watching the above situation carefully and if it pareiets, we intend to install a pH controller and a metering pump to raise our pH by adding NACH.

We are also continuing our investigation of your suggestion to our No. 3 preparal from our letter of January 27, 1976. We expect to reach a decision seem in order to implement the action by January 1, 1977.

If we can provide further information, please contact us. Thank you.

C. M. Miller

Congral Manager

/ Balling

cc: J. A. Desai

Andrew Montane

Managarja-Aparaganda, an Alai-Mallas depotation (crossing of the detion buy: angula article of a design (alai-person prop The Aparagan and Aparagan John B. Perkharst Chief Engineer an

NEED TO:

Head, Industrial Waste Section

THROUGH:

David A. Fosts JAH Supervisor, Industrial Intercetor

Supervisor, Industrial Heste Inspection and Hemitering

FRON:

Andy Montane Industrial Maste Inspi

SUBJECT:

Follow-up on Clack-Read

Arenth Street, Industry

Composite sampling at Cinch-Honadnock on July 16 and 17 revealed values ( total chrowium at 13.7 mg/l and 10.5 mg/l for cadmium, in violation of the Sanitation Districts' Phase I heavy metal effluent limits. Since there was a response to the Districts' notification letters, I was requested by Ban Arila to investigate why there was no response and what was being done to eliminate future excessive heavy metal discharges.

A Special

On Thursday, September 23, I visited Cinch-Honodrock and contacted, James P. Hiller, Vice-President. When asked why he never responded to the Districts letter, Mr. Miller was under the impression that compliance with the Sanitation Districts heavy metal limits on January 1, 1977 was the only item pertinent to Cinch-Honadnock. However, a letter will be sent immediately to the Districts with an implementation program for controlling the chrome and codmism discharge. Hr. Hiller apologized for any inconvenience he has caused toward the Districts.

Miss

ec: A. Arile



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## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mil Boad / Whittier, California Moting Address: / P. O Box 4998, Whitner, California 90467 Telephone: (2121 499-741) / From Los Angeles (213) 485-5217

JOINT D. PARDAMET

December 6, 1976

TRW. Inc./Cinch Honadnock Division 18301 E. Arenth Avenue Industry, California 91747

In reply, please refer to File: 21-00.05-00/76-3287.

Subject: Submittal of Industrial Mastewater Characterization Tests

#### Centlemen:

The impact of current water quality goals and the need to protect our.

environment requires that the Sanitation Districts obtain a complete inventory
of the industrial mastemater quantities and constituents reaching the sources
system serving your community. To provide adequate information on industrial
mastemater discharges, the Districts have established a program for the
issuance of industrial mastematers discharge permits to all companies that
discharge industrial mastematers to the sewerage system. State and federal lum
require that industrial self-conitoring be required as part of the discharge
permit. This self-conitoring system supplies the Districts with the information
needed to categorize the types and amounts of pollutants discharged to the
environment. It also serves as means for industrial personnel to evaluable
compliance with applicable discharge requirements.

The self-monitoring is to be performed at the frequency indicated on the "required wastewater characterization tests" page of the industrial westerniar discharge permit transmittal letter (see attacked). This page also indicates the pollutants to be tested. You are reminded that the critical parameters are to be determined and the report forms submitted to the Districts according to the following schedule:

1. Annual analysis -- July 1

2. Semi-annual analysis - January 1, dely 1

3. Quarterly analysis -- January 1, April 1, Jely 1, October 1

Submittal of the self-conitoring reports according to this schedule is important to the Districts in their efforts to establish an effective system of industrial self-conitoring. The Districts feel that the timely submittal of this information establishes an important data base whereby a company may evaluate its compliance with industrial wastewater discharge requirements.

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· 1985年1987年 - 1985年 -Social programme of the second Enforcement actions may be instituted against companies which do not submit the critical parameter reports within 45 days of the appropriate deadline. By is hoped that a cooperative effort between the Districts and your company will serve to safeguard the environment and most all appropriate water quality stand Should you have any questions regarding this matter please call Bon Arile of the Districts' Industrial Waste Section at (213) 699-7411, extension 277.

### TRW CINCH-MONADNOCK

December 14, 1976

1 July 2015 45 45 45 50

Mr. John D. Parkinset Chief Engineer County Sanitation Districts of Les Angeles County P.O. Bux 4998 Whittier, GA 90687

> Re: Industrial Wastewater Discharge File: 21-00.05-00/76-3287

#### Dear Mr. Parkhuret:

As a follow on to recent correspondence regarding control of cadmium and cyanide in our wastewater, we wish to advise you that we are working to reach a solution to the problem as indicated in provious correspondence.

We have retained a professional wastewater and chemical control firm to help us solve the problem. Under their direction, we have been collecting data and performing various tests for several months and feel that on the basis of the conclusions reached from our efforts, we will be in a position to submit a complete system to the County for evaluation on or about January 15, 1977.

We intend to stay in close contact with yea on this matter. If you have any questions, please sall me.

C. M. Miller General Manager

CMM:

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Policianty 10, 1977

County Sentination Districts Mr. John D. Parkimerst, Chief Eq

of Les Aspoles Co

P. O. 3ee 4998

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COM ONE CARPORNER. We will stay in contact with your effice and advise you as seen as we h

the argency of a reply to our request.

Truck you for your countdors then

General Manager

X

### SANITATION DISTRICTS OF LOS ANGELES COUNTY

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STATEMENT OF ACCURACY OF DATA		
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C.M. MILLER	gene	ral Manager
a/7/77 le/ Boso	- V	reason or comment and comments Figure 15

Chemical Consultants, 1160 Centre Dr. Unit E. Industry, Ca 91789



## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Boad / Whittier, California Mailing Address: / P. O. Boa: 4998, Whittier, California 90467 Felaphane: (2131 699-7411 / From Los Angeles (2131 645-5217

ACHOL D. PROSPRESSE Chief Engister and Gounest Manager

TRW-Cinch Homadnock 18301 East Arenth Street Industry, Ch. 91747

File:

my 16, 1977

21-00.05-00/77-3287

Attention: Charles M. Miller

Subject: Required Critical Parameter Report Under

Industrial Mastewater Discharge Peruit Ba. 3367

Boar Mr. Miller:

Your Industrial Wastemater Discharge Permit was approved in the Districts' letter dated October 14, 1975. One of the requirements specified in the approval was the submittal of Critical Parameter (chanical analysis) Reports to the Districts according to the Frequency of Laboratory Analysis Form issued with the Permit.

Your latest Critical Parameter Report was received on (mone received). The Districts have reviewed this report and found that it is delinquent in the following areas:

The analyses submitted by your company indicate that it is in violation of the Sanitation Districts' Phase I effluent limits, copy attached. Corrective actions must be taken to reduce the discharge of the parameters underlined in red on the attached copy of your report. A detailed description, and plans if necessary, of the required corrective actions must be submitted to the Sanitation Districts. Any proposed significant pretreatment system modifications must be approved by the Sanitation Districts prior to construction. Compliance with this requirement is necessary to ensure continued use of the public sewerage system for industrial wastenator discharge.

The parameters underlined in red must also be reported as required on the Frequency of Laboratory Analysis form issued with your Permit.

You are not in compliance with the Districts requirements for the submittal of Critical Parameter Reports.

Please submit a Critical Parameter Report on the items specified in your permit approval within 30 days of this letter and according to the required frequency thereafter.

The Critical Parameter representative of your	Amort must be signed by a company.
Other:	•

The above items must be completed and returned to the Sanitation Districts within 30 days of the date of this letter. If you have any questions regarding these requirements, please call the Districts' Industrial Maste Section at (213) 699-7411 or (213) 686-8217, extension 261.

Chief Engineer e

WOTE: You are reminded that the critical parameters are to be determined and the report forms submitted to the Districts according to the following schedule:

Annual analysis -- July 1
 Semi-annual analysis -- January 1, July 1
 Quarterly analysis -- January 1, April 1, July 1, October 1

RECEIVED

### HEMICAL CONSULTANTS

1100 CENTRE DRIVE INDUSTRY, CALIFORNIA 91380 (714) 806-3179 - 8121 985-788

	A REPORT PREPARED POR.	DATE:	June 8, 1977
18201 B. Arenth Ct	Cinch Nonadnock	RECEIVED	June 1, 1977
T AND	Div of T.R.W. Inc	CHETOMER P.D.:	Verbal per J. Dans
City of Industry, Ca 91747 (os so. W=0013	City of Industry, Ca 91747	LOG #0.	¥-0013

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CHEMICAL COMBULTANTS

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CHARLES M. MILLER GENERAL MANAGER

C.

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Graph T. James

#### SARITATION DISTRICTS OF LOS ANGELES COUNTY MOUSTRIAL WASTEWATER CRITICAL PARAMETER REPORT FORM

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Permit No 3287

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..... . SANITATION DISTRICTS OF LOS ANGELES COUNTY John D. Parkhurst, Chief Engineer and General Manager Telephone: (213) 699-7411 / From Los Anestes (213) 665-6217 SURCHARGE ACCOUNT NO. 47.00 INDUSTRIAL WASTEWATER 3257 CRITICAL PARAMETER REPORT FORM **#**71 TIM CINCH NONADMOCK CA 9174 18301 E. Arenth, Industry. llam; 11/30 to 11am; 12/1 Last stage of clarifler 10/1/77 12/31/77 . GENERA GIATEGREE POR DAY BYT DASABLES O SPECET SEASONS D METERED WATER SAFELY THE COMPONE 0 CRITICAL PARAMETER VALUES SMARTITY VALUES | COOR MARAMETER V PARAMETER V ¥ WASTEWATER PLOW (TOWN) 8880 mm MANGANESE - TIME WASTE WATER FLOW Proci ME BEURY - Year • 17.0 MOLYBOTHUM - Tell ---WCKEL - 144 BELEVILLE - Tomo 7 SALVER - TORS TOTAL DOSOLVED SOLIDS • . AMBRONIA BUT BOOKUN - Tens MAJOR - DISSOLVED THALLKEY - THE CYAMPA 12.1 TIN - Years TITANAGE - TOTAL PLANTER n ALLESSEE - Toron -Z plac - Tomat ANT MACHY - THE 84 OIL & GREAM ARMENIC - Tons PORTOL . -BERYLLAN - Tops × SURFACTANTS BERASI CHE DESTRUCTED -.. CACHELIN - Tom 13.7 ~ CHILDR. MESTICIDES & MESTI -COSTONOLOGI, Total -BADIOACTIVITY MAREN COBALT - Total u ~ -TEMPERATURE . HOOM - Tone COLOR THIOSUL PATE OF • LEAD - Town 8 MINISTERAL PARAMETERS Report When Arrested OTHER CRITICAL PARAMETS . CALCIUM Al MACHETAL 4 POTAMAN -I AZ --

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WESTERN AMALYTICAL LABS, 4657 Riverside Dr., Chino, CA 91710, by J. Zimmer

STATEMENT OF ACCURACY OF BATA

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Charles M Miller 10/13/77. CHARLES M MILLER GENERAL MANAGER 213/44-67

THIS FORM MAY BE FOLDED AND STAPLED FOR USE AS A RETURN MAILER. SEE REVERSE SIDE.



2

## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road / Whiteler, Collection Meding Address: / P. O. Box 4998, Whiteler, Collection 90407 Telephone: (213) 499-7411 / From Les Ampeles (213) 445-5217

ICHOLD, PAREDURET Chief Engineer and General Manuary

May 19, 1978

TRV-Cinch Monadnock 18301 East Arenth St. Industry, CA 91747 File: 21-00.05-00/78-3287

Attention: Charles M. Miller

Subject: Required Critical Parameter Report Under Industrial Mestewater Discharge Permit No. 3287

Amer Mr. Miller:

Tour Industrial Wasternter Discharge Permit was approved in the Districts' letter dated Oct. 14, 1975. One of the requirements specified in the approval was the submittal of Critical Parameter (charical analysis) Reports to the Districts according to the Frequency of Laboratory Analysis Form issued with the Permit.

Your latest Critical Parameter Report was received on 12-22-77. The Districts have reviewed this report and found that it is delinquent in the following areas:

- The analyses submitted by your company indicate that it is in violation of the Sanitation Districts' Place I effluent limits, copy attached. Corrective actions must be taken to reduce the discharge of the parameters underlined in red on the attached copy of your report. A detailed description, and plans if necessary, of the required corrective actions must be satisfied to the Sanitation Districts. Any proposed significant pretreatment system modifications must be approved by the Sanitation Districts prior to construction. Compliance with this requirement is necessary to ensure continued use of the public sources system for industrial wastewater discharge.
  - The parameters underlined in red must also be reported as required on the Frequency of Laboratory Analysis Form issued with your Permit.
- You are not in compliance with the Districts requirements for the submittal of Critical Parameter Reports.

  Please submit a Critical Parameter Report on the items specified in your permit approval within 30 days of this letter and according to the required frequency thereafter.

المستخدم والمستنية الأسان المستخدم

The Critical Parameter Report must be signed by a . representative of your company.

Other:

The above items must be completed and returned to the Sanitation Districts within 30 days of the date of this letter. If you have any questions regarding these requirements, please call the Districts' Industrial Waste Section at (213) 699-7411 or (213) 685-5217, extension #261.

Very truly years.

John B. Parkhurst Chief Engineer and General Manager

By Such D. Rose Lestie B. Rose Supervising Industrial Waste Engineer

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NOTE: You are reminded that the critical parameters are to be determined and the report forms submitted to the Districts according to the following schedule:

Annual analysis -- July 1

Semi-annual analysis -- January 1, July 1
 Quarterly analysis -- January 1, April 1, July 1, October 1

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Work performed at: San Jose Creek Water Quality Laboratory, County Sanitation Districts of Los Angeles County

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### TRW CINCH-MONADNOCK

June 19, 1978

Mr. John D. Parkimret
Chief Engineer and General Manager
County Sanitation Districts of Les Angeles County
P. O. Box 4998
Whittier, CA 98687

Re: File 21-00.05-00/78-3287

Dear Mr. Parkharet:

Per your letter of May 19th, we have submitted a Critical Parameter Report on the items specified in our permit approval.

Our sincerest spologies for the tardiness in submitting this report. We have taken steps to assure that we will meet all fature dotes called out in your letter for submission of the reports.

Based on the results of the analysis submitted, we recognise that our effluent now exceeds the maximums authorized under Phase I of the central period.

In order to improve the effluent, we have instituted a stagment rime system which will follow both contaminant sources, the electroclement and the plating tanks.

These stagmant rimes will be used to reduce the dragout from heavily contaminated solutions to the flowing rimes.

The stagmant rinse concentration of cyanide and cadmium will be kept under one-fourth of the concentration in the conteminant tanks. The stagmant rinse tanks will be dumped (as the contamination reaches 25%) into a holding tank (800 gal.) which will be pumped and dumped at an authorised dumping station.

The stagmant rinses will also be used to make up the loss from electrocleaner and plating solutions.

THE STATE OF THE STATE OF THE STATE STATE

June 19, 1976

Mr. John D. Parkharet

By reducing the dragout to about one-fourth of the concentration and centralizing the discensing of chlorine (controlled by a sensor in the discharge line of flowing rinses combined), we should be able to co with the requirements.

Thank you for your considerations.

CMM :

SANITATION	DISTRICTS	OF LOS	AMCEL	EC.	COL BATTY

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John D. Parkhurst, Chief Engineer and Gimeral Manager phone: (213) 699-7411 - From Los Angelis (213) 685-5217

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MESTERN ANALYTICAL LABORATORIES, INC., 4657 Riverside Dr., Chino, CA 91710, by J.R. Ern

Muille 6-19-78 Industry, CA 91744

C.M. MILLER -GENERAL MANAGER 213/964-6581

THIS FORM MAY BE FOLDED AND STAPLED FOR USE AS A RETURN MAILER. SEE REVERSE SIDE

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## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Bood / Whittier California Mailing Address: / P. O. Box 4998, Whittier, California 90607 Telephone: (213) 699-7411 / From Los Angeles (213) 685-5217

JOHN D. PARKHURS'
Chief Engineer and General Manager

August 21, 1978

TRM-Cinch Monadnock 18301 E. Arenth St. Industry, CA 91747

File: 21-00.05-00/78-3287

Attention: Charles M. Miller, General Manager

Subject: Required Critical Parameter Report Under

Industrial Wastewater Discharge Permit No. 3287

Der Kr. Hiller:

Your Industrial Mastewater Discharge Permit was approved in the Districts' letter dated Oct. 14, 1975. One of the requirements specified in the approval was the submittal of Critical Parameter (chemical analysis) Reports to the Districts according to the Frequency of Laboratory Analysis Form issued with the Permit.

Your latest Critical Farameter Report was received on 6-21-78. The Districts have reviewed this report and found that it is delinquent in the following areas:

The analyses submitted by your company indicate that it is in violation of the Sanitation Districts' Phase I effluent limits, copy attached. Corrective actions must be taken to reduce the discharge of the parameters underlined in red on the attached copy of your report. A detailed description, and plans if necessary, of the required corrective actions must be submitted to the Sanitation Districts. Any proposed significant pretreatment system modifications must be approved by the Sanitation Districts prior to construction. Compliance with this requirement is necessary to ensure continued use of the public severage system for industrial wastewater discharge.

The parameters underlined in red must also be reported as required on the Frequency of Laboratory Analysis Form issued with your Permit.

You are not in compliance with the Districts requirements for the submittal of Critical Parameter Reports.

Please submit a Critical Parameter Report on the items specified in your permit approval within 30 days of this letter and according to the required frequency thereafter.

The Critical Parameter Report must be signed by a representative of your company.

Other:

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The above items must be completed and returned to the Sanitation Districts within 30 days of the date of this letter. If you have any questions regarding these requirements, please call the Districts' Industrial Waste Section at (213) 699-7411 or (213) 685-5217, extension #261.

Very truly years.

John B. Parkhurst Chief Engineer and General Manager

By Sea S. Misch
Leon S. Directo
Supervising Civil Engineer

327:LSB:tle

Encls.\*

MOTE: You are reminded that the critical parameters are to be determined and the report forms submitted to the Districts according to the following schedule:

1. Annual analysis -- July 1

Semi-annual analysis -- January 1, July 1
 Quarterly analysis -- January 1, April 1, July 1, October 1

and the second				
Location	indictor			
Sample Type	34 Ar Composite.	. Industrial Waste		٠.
Time and Date				
AFE-WO	2129-625	Requested by	Jay Kremer	
Сору	Kremer, Wunderli	ch, Rose		

Laboratory Job Number	\$204753	SJ0	\$30	<b>8J0</b>	\$30
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Total Solids, mg/l					
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Total Sulfide, mg/l S		1			
Soluble Sulfide, mg/1 S					
Total Phosphate, mg/1 PO4					
Total Cyanide, mg/1 CN	(56.4)				
Thiocyanate, mg/1 SCN					
Total Cadmium, mg/l Cd	145.6				
Total Chromium, mg/l Cr			1		
Hexavalent Chromium, mg/l Cr					
Total Copper, mg/l Cu					
Total Lead, mg/l Pb					
Total Manganese, mg/l Mn		I			
Total Mercury, mg/1 Hg					
Total Nickel, mg/l Ni					
Total Silica, mg/l SiO2					
Total Zinc, mg/l 3.1		L			
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MBAS, mg/l LAS					
Oil and Grease, mg/l					
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Work performed at: San Jose Creek Water Quality Laboratory, County Sanitation Districts of Los Angeles County

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John 9. Perthurst Chief Engineer and General Manager

> 1.M. Peruit 3267 October 13, 1978

MENO TO:

Jay 6. Kresser

Head, Industrial Weste Section

THRU:

Ross C. Caballero

Supervisor, Industrial Waste

Inspection and Monitoring

FRON:

Sab Herrane

Industrial Waste Inspector

SUBJECT:

Issuance of Violation Notice V-20112 to Cinch-Managinett.

18301 E. Arenth Avenue, Industry, District 21

On Monday, September 25th, Dung Rands and I met with Jim Dmant, plant engineer and G. Paul Fanton, chief engineer of the TRI/Cinch-Monadnock Company. Me informed them that the results of a 24-hour composite sample taken August 24/25, 1978 by the Districts' monitoring crew showed the wastewater contained concentrations of cyamids and cadmium in excess of the Districts' Phase I limits. As a result of this sampling we issued them a violation notice for violating Sections 406J and 486X of the CSD Ordinance. The follow-up date was set at 11-3-78.

Mr. Daunt explained his plating operation which consists of a cadmium cyunidal barrel plating line manually operated. There are two static rinses after the cadmius plate tank. However, at the time of the sampling only one was in operation because of leaks in the second tank. It had recently come to Mr. Daunt's attention that the plater was discharging spent ammonium nitrate used for cadmium stripping into the floor trench where the flowing rinses to the sewer are located. High cadmium concentrations could be accounted for as a result of this since discontinued praction 800 gallon holding tank for spent cadmium solutions and dragout tanks is install-outside the main building. This waste is hauled away to proper disposal situs.

The question of spill containment was brought up. Presently Cinch-Homadnock has none. All flowing rinses are piped through a system where chlorine is added to cyanide destruction and the wastewater then discharged to a floor drain. The build of a dike around this drain with rinses pumped over and into the drain was discusse as one possible spill containment system. They will discuss this idea and others w their management and send in their proposal to the CSD. They also requested that future correspondence with TRM/Cinch Monadnock be called to the attention of C.M. Hiller, general manager.

BH:se 9/29/78

cc: E. Burr

F. Janssen

S. Gupta

L. Directs



### COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Based / Whittier, Culture Mailing Address / P. O. Ban 4998, Whiteier, California 90607 Telephone: (213) 699-7411 / From Les Angeles (213) 685-5217

JOHN D. PARIFFARES Chief Sections and Council Many

October 13, 1978

File: 21-00.05-60/78-3287

TRM - Clack Renedenck 18301 E. Arenth Amm Industry, California 91747

Attention: Nr. C.M. Hiller

Conere | Nanogar

Notice of Violation No. 20112, Violation of Mestweter Discharge Regulations, Phase I Industrial Effluent Limits Subject:

Dear Pr. Miler:

Enclosed is a copy of "Notice of Violation" No. 20112 which was issued to TRM - Cinch Monadnock on September 25, 1978 as a result of continued violation of requirements established by the Sanitation Districts' Mastewater Ordinance and Phase I industrial effluent limits. The nature of noncompliance is outli on the "Notice of Violation" along with a required date of correction. This notice was formally received by Jim Daunt, an employee of your company.

Issuance of a "Notice of Violation" serves as legal motification of a violation of the Districts' <u>Mastewater Ordinance</u> and, as such, is a step in the Sanitation Districts' formal enforcement procedure. Pistricts' notification of your company concerning the requirement to meet Phese I effluent limits by January 1, 1977 was a previous step in this process. If violations are not corrected, enforcement actions may ultimately result in revocation of your company's Industrial Wastewater Discharge Permit an in prohibition of industrial wastewater discharges. In addition, continue violations could subject your company to civil liability for sums up to \$6000 or to misdemeanor criminal penalties for each day of violation. In issuing a "Notice of Violation", it is the Sanitation Districts' intention to expedite your compliance so that further enforcement actions will not be necessary.

Within 45 days of the date of issuance of the "Notice of Vielation", your company is required to be in compliance, and to inform the Districts in writing how compliance was attained, or to submit a proposal describing your plans for achieving compliance. Your compliance proposal must include a schedule showing starting and completion dates of any work required to achieve the Districts' requirements. If extensive modifications will be required, no commitments beyond design and planning should be undertaken before review and approval of your proposal by the Sanitation Districts. Plans for any substantial physical modifications of discharge or pretreatment facilities must be prepared and signed by an engineer registered in California before submittal.

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Work performed at: San Jose Creek Water Quality Laboratory, County
Sanitation Districts of Los Angeles County



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mil Boad / Whitier, California Mainig Address: / P. O. Ban 4998, Whitier, California 90607 Talaphana: (213) 699-7411 / From Las Angoles (213) 665-5217

JOHN D. PARCHUEST

Hovember 16, 1978

TRY-Cinch Monadnock 18301 E. Arenth St. Industry, CA 91747 File: 21-00.05-06/78-3287

Attention: Charles M. Miller, General Manager

Subject: Required Critical Paremeter Report Under

Industrial Mastewater Discharge Permit No. 3287

Dear Mr. Miller:

Your Industrial Mastewater Discharge Permit was approved in the Districts' letter dated Oct. 14, 1975. One of the requirements specified in the approval was the submittal of Critical Parameter (charical analysis) Reports to the Districts according to the Frequency of Laboratory Analysis Form issued with the Permit.

Your latest Critical Parameter Report was received on 6-21-78. The Districts have reviewed this report and found that it is deliminant in the following areas:

- The analyses submitted by your company indicate that it is in violation of the Sanitation Districts' Phase I effluent limits, copy attached. Corrective actions must be taken to reduce the discharge of the perameters underlined in red on the attached copy of your report. A detailed description, and plans if mecassary, of the required corrective actions must be submitted to the Sanitation Districts. Any proposed significant pretreatment system modifications must be approved by the Sanitation Districts prior to construction. Compliance with this requirement is necessary to ensure continued use of the public sources system for industrial mestewater discharge.
- The parameters underlined in red must also be reported as required on the Frequency of Laboratory Analysis Form issued with your Permit.
- You are not in compliance with the Districts requirements for the submittal of Critical Parameter Reports.

  Please submit a Critical Parameter Report on the items specified in your penult approval within 30 days of this letter and according to the required frequency thereafter.

The Critical Parameter Report must be signed by a representative of your company.

· Other:

The above items must be completed and returned to the Sanitation Districts within 30 days of the date of this letter. If you have any questions regarding these requirements, please call the Districts' Industrial Waste Section at (213) 699-7411 or (213) 685-5217, extension #261.

Yery truly years.

John B. Partherst Chief Engineer and General Hanager

See S. Birects
Leon S. Directs
Supervising Civil Engineer

JP:LSD:tle

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MOTE: You are reminded that the critical parameters are to be determined and the report forms submitted to the Districts according to the following schedule:

Annual analysis -- July 1
 Semi-annual analysis -- January 1, July 1
 Quarterly analysis -- January 1, April 1, July 1, October 1



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#### COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

ad / What 1955 Wareman Mill Pa Making Address: / P. O. Box 4998, Whither, California 90607. Telephone: (2:3) 699-7411 / From Las Angeles (213) 685-5217

JOHN D. PARIDARST Chief Engineer and General Manager

December 7, 1978

File: 21-00.05-00/78-3287

TRY Clack-Residence 18301 E. Arenth Aven Industry, California 91749

Attention: Mr. C.M. Miller

General Hanager

Compliance Agreement Neeting Concerning "Final Notice of Violation" No. 30256 Subject:

Deer Nr. Hiller:

Enclosed is a copy of "Final Notice of Violation" No. 30256 which was issued to The Cinch-Monadnock on November 27, 1978, as a result of continued violations of requirements established in the Sanitation Districts' Ordinance. The nature of noncompliance is outlined on the "Final Notice of Violation" along with a required date of correction. This notice was formally received by you.

Issuance of a "Final Notice of Violation" serves as legal motification of a continued violation and, as such, is the third step in the Districts' formal enforcement procedure. If violations are not corrected, the next step in the enforcement procedures may result in legal charges being filed against your company, and possible loss of the use of the public sewerage system for industrial wastewater discharge.

The purpose of the Districts' enforcement progrem is not to obstruct industrial operations, but to work with your company to achieve compliance with the Districts' Ordinance. For this reason, a meeting between the Head of the Districts' Industrial Waste Inspection and Monitoring Group. Ross Caballero and representatives of your company to discuss the means and timing for removing the violation is desirable.

A compliance meeting with TRW Cinch-Monadnock has therefore been set for January 3, 1979 at 10:00 a.m. at the Districts' Joint Administration Office at 1955 workman Mill Road, Whittier, California. It is anticipated that the following items will be discussed:

(a) Details of the violation.

(b) Problems created in the Districts' system.

(c) Procedures for remedial action to remove the violation.

(d) The timing of actions necessary to remove the violation.

The Districts received your letter of November 27, 1978, and the proposal therein will be disscussed as well.

Nr. C.M. Hiller December 7, 1978 Page Tum

It is hoped that the results of this meeting will negate any requirement for future enforcement actions.

If for any reason your company cannot attend the meeting at the time specified, please contact Frances Janssen of the Districts' Industrial Maste Section at (213) 699-7411, or (213) 685-5217, extension 273, to discuss an alternative meeting data.

Yery truly years.

John B. Partherst

Jay 6: Kremer Head, Industrial Maste Section

JGK:FJ:se cc: City of Industry Attn: Mr. John J. Modecki

Bochs. .

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SANITATION DISTRICTS OF LOS ANGELES COUNTY
ADIAND PARMILIEST CHIEF END Tales AND DETARA, MANAGER
1955 WORKMAN MILL ED PO BOX 4998 WHITTEE CALIFORNIA 90607
ATTENTION INDUSTRIAL WASTE SECTION
ADDRESS ALL CORPESIONITENCE TO THE ABOVE

NOTICE OF VIOLATION OF INDUSTRIAL WASTEWATER DISCHARGE MINUSATIONS

1. DISOWAGE		2 ADDRESS OF	WASTEWATER DISON		
3. PERSON CONTACTED (Name Title)	4 TIME OF VIOLATIO	IN Dose Hour	5 PERMIT NO 6 SIC NO 7 DISTRICT NO		
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Signature Signature		.•le·	Î erie	1	

### TRW CINCH-MONADNOCK

December 15, 1978

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Mr. John Radocki, City Engineer City of Industry Saite 222 National Engineering Company 255 N. Hacienda Blvd. City of Industry, CA 91744

Ref: Spill Containment System for Toxic Chamicals
File No. 21-00.05-00/78-3287

Dear Mr. Radocki:

In order to comply with violation No. 20112 dated August 24, 1978 and with violation No. 30256 dated November 8, 1978, we are summitting four (4) sets of drawings for your approval.

In order to prevent spillage from entering the County sewer system, we intend to divert all spillage flow into the trench which will act as a temporary reservoir. This action is totally feasible because the volume of the trench is greater than the volume of the largest tank in the system. The trench will normally be kept free of all liquids and other wastes by being pumped into a storage tank outside of the seath wall of our building. When this storage tank becomes near full, the contents will be healed away to a legal disposal site.

All water overflow from tanks 4, 7, 12, 13 and 16, as well as the chlerine tank, will be piped directly to the clarifier which discharges into the existing sewer system. The delaying action of the clarifier will allow the chlorine to kill any cyanide and belp reduce the cadmium in solution as well as precipitating the cadmium in suspension. In order to insure a proper scopply of chlorine, we intend to install a programmed chlorine feeder.

Under no circumstances do we plan to pump spillage into the County sewer system.

THINCHICH-BOALEMOCK, AN BLACTHOMIC COMPONITYS GIVENING OF 1000 ME. MICH EAST AND STIL AVENING. R. G. 500. WER, CITY OF MICHISTRY, CA, STIMP TELEPHONIS (TV.); SOLUMB Page 2 December 15, 1978

Mr. John Radecki, City Engineer

This work will begin as soon as we have your approval of the drawings submitted, as well as the approval by the County Sanitation District.

If you have any questions or comments, please call me at 213/964-6581.

C. M. Miller General Manager

CMM:

cc: (ay G. Kremez, Head-Industrial Waste Section County Sanitation District of Los Angeles County 1955 Workman Mill Road P.O. Box 4998 Whittier, CA 90607 (Two (2) sets of drawings)



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5287

WALTER E. GARRISON

# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1935 Workman Md Bood / Whitner, California Mailing Address: / P. O. Bax 4998: Whitner, California 90607 Telaphana: (213) 699-7411 / From Las Angeles (213) 685-5217

Chul Former and General Manne

January 22, 1979

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File: 21-00.05-00/79

TRN - Cinch Monadneck 1820 E. Arenth Avenue Industry, California 91749

Attention: Mr. Charles M. Miller

General Hamper

Subject: Outcome of Compliance Meeting Concurring "Final

Notice of Violation" No. 30256

Dear Mr. Hiller:

Thank you for your attendance at the compliance meeting held January 3, 1979 at the Districts' Joint Administration Office. It is hoped that the discussion that ensued clarified your understanding of the Districts' Phase I limits, as well as providing you with an opportunity to explain the steps your company is taking to come into compliance.

As agreed upon at the compliance meeting, you contacted this effice after obtaining the services of a contractor to complete the necessary spill containment and plumbing construction. Based on the information you provided in your telephone conversation regarding this matter, the Districts are granting your company until March 2, 1979 for completion of the necessary construction. In the meantime your company is expected to take all possible precautions to minimize the discharge of heavy metals and cyanide to the semma.

The purpose of the Districts enforcement program is not to electronic industrial operations but to work with companies to achieve compliance. However, if your company is not in compliance by March 2, 1979 the Bi. bricks may find it necessary to consider legal action against your company, which could include action by the Los Angeles County District Attorney in accordance with the provisions of Section 202 of the Districts' Ordinance (copy exclased). To avoid the necessity for such actions your company is urged to comply with the Phase I limits by the above time limit.

Mr. Charles M. Miller January 22, 1979 Page Two

If you have any questions please contact Frances Jamssen of the Districts' Industrial Waste Section at (213) 699-7411, extension 273.

Yery truly yours,

Walter E. Garrison

Jay G. Kremer Head, Industrial Waste Section

**.. )** ---

JEK:FEJ:se

Excls. \*

## TRW CINCH-MONADNOCK

February 13, 1979

Mr. Jay G. Kremer Head, Industrial Waste Section County Sanitation Districts of Les Angeles County 1955 Workman Mill Road P. O. Ben 4998 Whittier, CA 90607

Ref: File 21-00.05-00/79

Door Mr. Eromor:

This is to advise you that all construction work has been completed as outlined at our compliance mosting of January 3, 1979 at the Bistoist Joint Administration Office.

The necessary spill containment sad plumbing construction was installed according to the plan drawing submitted prior to our January 3 meeting.

Our incilities are open for your inspection of the work as completed. We look forward to your visit.

Thank you for your considerations.

ouwiller

C. M. Miller

General Menager

CMM:

cc: Frances Janes en

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# COUNTY SANITATION DISTRICT OF LOS ANGELES COUN

1955 Warkman Mill Bood / Whithier, California Mailing Address / P. O. Box 4998, Whither, California 90607 Telephona: (213: 699-7411 / From Los Angeles (213) 685-5217

WALTER E. GARRE Chief Engages and Garard Man

February 21, 1979

TRW-Cinch Monadnock 18301 E. Arenth St. Industry, CA 91747

File: 21-00.05-00/79-3287

Attention: Charles M. Miller, General Manager

Subject: Required Critical Parameter Report Under

Industrial Westewater Discharge Permit No. 3287

Dear Mr. Miller:

Your Industrial Wastewater Discharge Permit was approved in the Districts' letter dated Oct. 14, 1975. One of the requirements specified in the approval was the submittal of Critical Parameter (chanical analysis) Reports to the Districts according to the Frequency of Laboratory Analysis Form issued with the Permit.

Your latest Critical Parameter Report was received on 6-21-78. The Districts have reviewed this report and found that it is delinquent in the following areas:

- The analyses submitted by your company indicate that it is in violation of the Sanitation Districts' Phase I effluent limits, copy attached. Corrective actions must be taken to reduce the discharge of the parameters underlined in red on the attached copy of your report. A detailed description, and plans if necessary, of the required corrective actions must be submitted to the Sanitation Districts. Any proposed significant pretreatment system modifications must be approved by the Sanitation Districts prior to construction. Compliance with this requirement is necessary to ensure continued use of the public sewerage system for industrial wastewater discharge.
  - The parameters underlined in red must also be reported as required on the Frequency of Laboratory Analysis Form issued with your Permit.
- You are not in compliance with the Districts requirements for the submittal of Critical Parameter Reports.

  Please submit a Critical Parameter Report on the items specified in your permit approval within 30 days of this letter and according to the required frequency thereafter.

The Critical Parameter Report must be signed by a representative of your company. Other:

The above items must be completed and returned to the Sanitation Districts within 30 days of the date of this letter. If you have any questions regarding these requirements, please call the Districts' Industrial Waste Section at (213) 699-7411 or (213) 685-5217, extension #261.

Very truly yours.

Walter E. Garrison

Cean S. Directe
Supervising Civil Engineer

WEG:LSD:tle

Escis. .

NOTE: You are reminded that the critical parameters are to be determined and the report forms submitted to the Districts according to the following schedule:

Annual Analysis -- July 1
 Semi-Annual Analysis -- January 1, July 1
 Quarterly Analysis -- January 1, April 1, July 1, October 1

## TRW CINCH-MONADNOCK

March 9, 1979

Mr. Leon S. Directo, Supervising Civil Engineer County Sanitation Districts of Les Angeles County 1955 Workman Mill Road P.O. Bez 4998 Whittier, CA 90607

File: 21-00.05-00/79-3287

Industrial Wastewater Dischary

Permit No. 3287

Dear Mr. Birocto:

Per your letter of February 21, 1979, we have attached the Critical Parameter Report for the period October 1, 1978 to December 31, 1978.

We have set up a stringent procedure to assure submission of this report according to the required frequency: April 1, July 1, October 1, January 1.

Thank you for your considerations.

C. M. Miller

General Manager

CMM:me

cc: Walter E. Garrison

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THIS FORM MAY BE FOLDED AND STAPLED FOR USE AS A RETURN MAILER. SEE REVERSE SIDE.

TRW-CINCH MONADHOCK

## TRW CINCH-MONADNOCK

April 11, 1979

Mr. Lean S. Directo Supervising Civil Engineer County Smithtion Districts of Les Angeles County 1955 Workman Mill Read PO Ben 4998 Whittier, CA 90467

File: 21-00.05-00/79-3287

Dear Mr. Director

Per your letter of February 21, 1979 regarding the required critical parameter report, we have attached some covering the period 1-1-79 to 3-31-79.

This report was prepared for us by the Western Analytical Laboratories, Inc.

If we can provide further data, please call on ma.

Thank you for your considerations.

C. M. Miller General Manager

CMM

cc: Walter E. Carrison

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V CHARLES M MILLER GENERAL DIANAGER 212/164-

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STATE APPROVED WATER LABORATORY

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STATE APPROVED MATTER LANGUATORY

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SANITATION DISTRICTS OF LOS ANGELES COUNTY
Malter E. Garrison, Chief Engineer & General Hanage
Totophone (213) 690-7411 / From Los Angeles (213) 695-5217
INDUSTRIAL WASTEWATER
CRITICAL PARAMETER REPORT FORM

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# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Wartman Mill Baud / Whithier, Coffieratio Mailing Address: / P. O. Ban 4999, Whithier, Coffieratio 90607 Telephono: (213) 499-7411 / From Los Angeles (213) 465-5217 Hovember B. 1979

WALTER E. GAMESC Chief Engineer and General Municipal 7-3-7

File: 21-00.05-00/79

TRI - Cinch Monadouck 1820 E. Arenth Avenue Industry, California 92749

Attention: Mr. Charles M. Hiller

General Hanager

Subject: Compliance with the Districts' Phase I Limits

Deer Mr. Miller:

The Sanitation Districts are writing this letter to acknowledge the discussion which took place in a recent meeting with your company at your plant on November 1, 1979. Shai Gupta and Bob Herrman of the Sanitation Districts met with Jim Daunt and Paul Fanton of your company to discuss the progress your company is making in meeting the Districts' Phase I limits.

In extended discussion with your company, the Districts were told that your company is in the process of installing an automatic cyanide exidation system utilizing chlorination to control Cd and M discharged into the sewer system. It is the Districts' understanding that you have received most of the equipment for this pretreatment system.

Based on the progress Cinch Monadmock has made in meeting the Phase I limits, and on the personal commitment of Paul Fanton, the Samitation Districts agree to extend the compliance deadline date for meeting the Phase I limits to December 17, 1979. In the meantime your company is expected to take every possible precaution to minimize the discharges of Cd and CR into the Districts' sever system.

You are reminded that the Districts informed your company of the Phase I requirements well in advance of the March 2, 1979, previous deadline date for compliance. It is the Districts understanding that Cinch Monadnock will meet the Phase I limits by December 17, 1979. This date is approximately 3 years after the effective date of Phase I enforcement of January 1, 1977 and about four and one-half years after the Districts' effluent limitations mere announced on July 1, 1975. The Districts consider that you are obligated to improve on the extended compliance date if possible, and to utilize any available opportunity to accelerate the project schedule.

Your company's full cooperation is requested to resolve this non-compliance problem. The Districts have now exhausted their internal enforcement procedures and failure to comply with the Phase I limits by December 17, 1979 may result in more severe enforcement actions against your company, including action by the Los Angeles County District Attorney in accordance with the provisions of Section 202 of the Districts' Ordinance. Your company is urged to meet the Phase I limits within the extended deadline date to avoid the need for such actions.

Mr. Charles H. Miller November 8, 1979 Page Two

If you have any questions regarding these matters, please call  $\bf Shai \ appears$  in the Industrial Waste Section at Extension 278.

Yery trely years.

Halter E. Carrison

Jay 6. Bruner Head, Industrial Nurte Section

JK:55:00

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## TRW CINCH-MONADNOCK

December 18, 1979

Mr. W. E. Garrison, Chief Engr. & Gen. Mgr. County Sanitation Districts of Lee Angelee County 1955 Workman Mill Reed P. O. Ben 4918 Whittier, GA 98667

Attention: Chris Holten

Door Me. Holton:

Per your recent request, we have attached three (3) capies of the revised layout of our sewer and spillage system as designed and completed several mentils age.

If others in your organisation desire copies of this hyunt, please distribute these copies accordingly. If more are moded, please advise.

Thank you for your considerations.

C. M. Miller General Manager

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### COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

nd / Whittier, California Making Address: / P. O. Box 4998, Whittier, California 90607 Telephone: (213) 699-7411 / From Los Angeles (213) 685-5217

WALTER E. GASSICON Chief Engineer and General Manager

Jenuary 2, 1980

In reply, please refer to File:21-00.05-00/80-3287C

City of Industry 255 M. Hacienda Blvd., Seite 222 Industry, CA 91744

Attention: John J. Redocki

Subject: Industrial Westmeter Discharge Permit No. 2007 8-1

TRI - Cinch Honodrock Division 18301 E. Arenth Avenue Industry, CF 91740

### Der Hr. Redocki:

Enclosed are two (2) approved sets of plans; and caples of the approve Industrial Mastewater Discharge Permit for the subject company. Please review these for compliance with your requirements, and retain the copies you require for your files. A copy of this letter is forwarded to the applicant to notify him of the Sanitation Districts' permit requirements, which are in force from the current date. If any additional permit requirements are issued to the applicant by your agency, caples should be forwarded to the Sanitation Districts for our records. The approved plans consist of:

1. Plot Plan with Clarifier Detail

2. Plating Tank Layout and Spill Containment Proposal
3. Revised Plating Tank Layout and Spill Containment Proposal

Approval of the plans and permit is contingent upon continuing compliance with applicable Sanitation Districts' Ordinance requirements, upon any corrections shown in red on the drawings, and upon the items indicated on the attached requirement list.

If you have any questions concerning these requirements, please call Chris Kelton of the Sanitation Districts' Industrial Maste Section at extension 268.

Very truly years.

JCK:CTK:CB

cc: TRM - Cinch Monadnock Division 18301 E. Arenth Ave. Industry, CA 91749

Attn: Charles Miller, General Manager

Wilter E. Corrison

Jay D. Kremer Head, Industrial Waste Section

### SANITATION DISTRICTS OF LOS ANGELES COUNTY

Walter E. Garrison, Chief Engineer and General Manager 1955 Workman Mill Road, P. O. Box 4998, Whittier, California 90887

### INDUSTRIAL WASTEWATER DISCHARGE PENNET

### REQUIREMENT LIST

COMP	MY NAVE	TRM Clack	Monednock	Divisien	
INOU	STRIAL MASTEMATER DISCH	VAGE PERMIT	NO. <u>3287</u>	<b>R-1</b>	
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as a cond evid	The above named company condition of the permit itions should be supplicence will consist of a many official, and in some	y is require t approval. ed to the Sa minimum of a	ed to comp Satisfac Initition i written no	ly with all indicated tory evidence of complete requirements where required by	liance with these sted. Satisfactory a responsible
١.	Applicable requirements October 14, 1975 are st still valid except as r	ill in forc	e. Previo	usly approved plans a	
2.	Characterization tests at the intervals indica and reported on the endindicated analyses shou Sanitation Districts' a Characterization Tests upon written request wi company. It is the resanalyses of any other thist, which are known to	ted on the losed Criti ld be perfo pproved lab may be cons th valid su ponsibility toxic materi	Required C cal Parame ramed by a oratory. idered aft pporting i of the su als shown	haracterization Tosts ter Report Form. Al' State of California ( Revision of the Roque er initial analyses ( information from the i bject company to rope in the Critical Perm in the Critical Perm	r form  r  red  and  whiject  ret  retor
3.	This approval of the pr Sanitation Districts is proper construction and of the permittee and hi	for only t Inmintenance	he general te of the s	concept presented.	ibility
4.	The proposed spill cont 60 days of the date of	airment sys this letter	tem shall	he completed within	
5.	When spill containment concrete or masonry, the honded to the existing acid resistant sealant	we contact was surface and	mortar or c I all joint	concrete shall be is shall be sealed wi	th .

6. Under no circumstances shall process solution spills be discharged to the sewer. Unreclaimed or untreated process solution spills shall be hauled to a Class I landfill site for disposal. 7. The Sanitation Districts shall be notified in writing as soon as the spill containment system is complete, or if any construction changes are contemplated that substantially revise information given on previously approved plans. ---8. Present spill containment requirements shall apply to any future installation of additional cleaning tanks as well as process tanks as long as Phase I limitations are in effect. -In the interest of health and safety, it is recommended that the process tanks containing cyanide be diked separately from areas wh there is a possibility of acid spills in order to prevent the possible mixing of acids with cyanides and formation of toxic hydrogen cyanide 10. An industrial wastewater sampling point(s), suitable for whtaining greb or continuous samples, must be provided and its location clearly indicated on plans submitted to the Districts. The sampling point must be located downstream of all sources of industrial wastewater and of any gravity separation intercepter or other pretreatment equipment. Safe and convenient access to the sampling point must be provided for representatives of the Sanitation Districts. Where practical, access to the sampling point shall be available from the public street, but the sampling point shall not be in any manhole located in the street. If a locked security enclosure is necessary, the Sanitation Districts shall be provided with two bays to the lock or the lock combination, or a Districts' padlock shall be used to secure the sampling point area. In a gravity flow system under atmospheric pressure, an acceptable sampling point will consist of a rectangular concrete b with approximately 18" x 20" internal plan dimensions, and with inlet and outlet piping inverts 12" above the bottom. sampling box shall be protected with a tightly fitted cover. which must be readily removable and accessible at all times. The walls of the sampling box must extend 3" above the general surrounding grade to exclude surface water. Plumbing codes will generally require a trap, went and cleanout downstream of the sampling box. In a full-flowing pressurized wastewater piping system, a sampling point should consist of a piping connection no smaller than a 3/4° coupling fitted with a suitable valve if necessary, and reduced to terminate in at least 2" of 5/16" O.D. stainless

steel tubing with wall thickness of .035" to .060". The tubing end shall be appropriately capped to avoid contamination and to contain the pressure if necessary. Pressure of the flowing wastewater must not exceed 10 PSIG at the sampling point.

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- 3 -11. The pH of the wastewater must be maintained above 6.0 at all times. Proper neutralization procedures must be observed to assure that this 囮 limit is not exceeded. ----12. An automatic continuous pH recording instrument must be installed to monitor the pH of the wastewater discharge stream entering the public sever. The probe for the pH instrument must be located downstream of any pretreatment operations or of branches which may be a source of industrial wastewater. The pH equipment must be regularly calibrated and maintained in good working order. At least 180 days of pH records must be filed at the discharge address and must be made available for inspection by representatives of the Sanitation Districts at any time during business hours. If pil records indicate periods of acidic or highly alkaline discharge, the applicant may be required to install a M pH controlled neutralization system. 13. In order to protect the Sanitation Districts' biological treatme plants and the environment, concentrated solutions of toxic cleaning compounds may not be drained to the sever system. If it becomes necessary to dispose of any toxic solutions, which cannot be reclaim they should be hauled to a Class I landfill approved by the Regional Mater Quality Control Board or other legal disposal facility. If additional information is desired on methods of disposal of taxic solutions, please contact Shai Supta of the Sanitation Districts' Industrial Maste Section at extension 278. From the information provided by the subject company, the following tanks must not be drained to the sever unless their heavy metal contact does not as the Districts' Phase I Limits, copy enclosed: Tk. Ros. 8 8 9, 10 8 11, 24 Sodium Cymride, Cadmium Tk. Nos. 17 Zinc Chromate and any other etching or stripping tanks containing excessive knewy M mtals. -14. Information requested, or satisfactory evidence of compliance, must be submitted to the Sanitation Districts within 60 days of the date of this letter (March 2, 1980) to satisfy condition Nos. 4, 10, 12.

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# SANITATION DISTRICTS OF LOS ANGELES COUNTY INDUSTRIAL NASTE SECTION REQUIRED MASTEWATER CHARACTERIZATION TESTS

Firm Name	TRW - Cinch Honadnock Divisio	n Permit No. 3287 R-1
Address of Property	18301 E. Arenth Avn.	Date January 2, 1980
Producing Wastewater—— Discharge	Industry, CA 91749	S.I.C. No. 3471
Eminusery of Analyses	One per 3 Months	1/ Flow 564,000 Gal/Ye

The following analyses and flow measurements shall be reported at the indicated frequency to the Sanitation Districts on the Districts' Critical Parameter Report Form (copy attached), which must be signed by an administrative officer of the company. Certain requested character ization tests may be deleted from future reports, if it can be demonstrated in writing that they exist in very minute amounts in the wastewater and are not used in any processes which generate wastewater.

ldent. Code	Test 3/		ident. Code	Test 3/
A	Flow (Total)	<u>y</u>		
B	Flow (Peek)	2/		
E	pH			
1	Cyanide	•		
P	Cadmium			
ָ מ	Chromium			
FF	Zinc			
96	011 and Grease			

- Companies required to submit only annual characterization analysis data should submit it directly to the Districts on July 1; companies required to submit data every 6 months should submit data on January 1, and July 1; companies required to submit data every 3 months should submit data on January 1, April 1, July 1, and October 1. Required industrial wastewater characterization analysis data not received within 45 days of the required date will be considered delinquent and a possible cause for revocation of the Industrial Wastewater Discharge Fermit.
- 2/ Total Flow and maximum 30-minute peak flow rate for the day when composite characterization sample is taken.
- It is the responsibility of the subject company to report analyses of any other toxic materials shown on the Critical Parameter Report Form, which are known to be present in the wastewater, or may occur in the wastewater as a result of a process change.

# SANITATION DISTRICTS OF LOS ANGELES COUNTY TABLE OF SURCHARGE TEST FREQUENCY

YEARLY CUMUL	ATIVE FLOW	Required Frequency of Tests for Surcharge Parameters				
Million Gallons	Million Cubic Feet	(Critical Parameters A, B, C, B) 1/ (Flow, Peak Flow, COD and Suspended Solids, resp				
Less than 6.0	Less than 0.80	0	¥			
6.0 to 15.0	0.80 to 2.00	1 per 6 Months				
15.0 to 36.0	2.00 to 4.80	1 per 3 Nueths				
36.0 to 250	4.80 to 33.33	1 per Month				
Over 250	Over 33.33	1 per Week	•			

### MOTES:

- 1/ Companies having peak flows of 100 gallons per minute or more or total flows of 30,000 gallons per working day or more must provide a continuous automatic indicating, totalizing and recording of total industrial wastewater flows discharged.
- 2/ Companies with cumulative yearly flows less than 6.0 million gallons may determine surcharge parameters for use in the "Long Form" Surcharge Statement or may pay for discharge at the current flat rate charge per million gallons used in the "Short Form" Surcharge Statement and not test for surcharge parameters. At least two determinations of the surcharge parameters must be made to furnish data for use in the "Long Form" Surcharge Statement.
- 3/ The frequency of tests specified in this table becomes effective on July 1, 1974 for the subsequent fiscal year.

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# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road / Whitrier, California Mailing Address: / P. O. Box 4998, Whillier, California 98607 Talaphane: (213) 699-7411 / From Los Angelos (213) 685-5217

WALTER E. GARRISON Chief Engineer and General Manager

TRW - Cinch Monadnock Div. 18301 E. Arenth Avenue Industry, Calif. 91749 January 29, 1980

Pile: 21-00.05-00/00-3287

Subject: Required Critical Parameter Report Under Industrial Mastewater Discharge Permit Ro.

Beer Mr. Miller:

Your Industrial Wastawater Discharge Permit was approved in the Districts' letter dated January 2, 1980. One of the requirements specified in the approval was the submittal of Critical Parameter (chamical analysis) Reports to the Districts according to the Frequency of Laboratory Analysis Form issued with the Permit.

Your latest Critical Parameter Report was received on January 29, 1900. The Districts have reviewed this report and found that it is deliminant in the following areas:

The analyses submitted by your company indicate that it is in violation of the Sanitation Districts' Phase I effluent limits, copy attached. Corrective actions must be taken to reduce the discharge of the parameters underlined in red on the attached copy of your report. A detailed description, and plans if necessary, of the required corrective actions must be submitted to the Sanitation Districts. Any proposed significant pretreatment system modifications must be approved by the Sanitation Districts prior to construction. Compliance with this requirement is necessary to ensure continued use of the public sewerage system for industrial westawater discharge.

The parameters underlined in red must also be reported as required on the Frequency of Laboratory Analysis Form issued with your Permit.

You are not in compliance with the Districts requirements; for the submittal of Critical Parameter Reports.

Please submit a Critical Parameter Report on the items specified in your permit approval within 30 days of this letter and according to the required frequency thereafter.

The Critical Parameter Report must be signed by a representative of your company.

Other:

The above items must be completed and returned to the Sanitation Districts within 30 days of the date of this letter. If you have any questions regarding these requirements, please call the Districts' Industrial Maste Section at (213) 699-7411 or (213) 685-5217, extension #261.

Tery troly yours.

Balter E. Garrison

By J. Masels Leon S. Directo Supervising Civil Engineer

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NOTE: You are reminded that the critical parameters are to be determined and the report forms submitted to the Districts according to the following schedule:

Annual Analysis -- July 1
 Semi-Annual Analysis -- January 1, July 1
 Quarterly Analysis -- January 1, April 1, July 1, October 1



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Vissiman Mil Paud / Whitter, Culifornia Mailing - Edress / P. O. Baz 4998, Whitter, California 90607 Telephone (212) 699-7411 / From Los Angales (213) 685-5217

WALTES E. GARRISON Charl Engineer and General Manager

TRW Cinch Monodock Division 18301 East Arenth Avenue Industry, Ca. 91749

May 9, 1980

File:21-00.05-00/80-3287

Subject: Required Critical Parameter Report Under

Industrial Mastewater Discharge Permit No. 3287

Der Mr. Miller:

Your Industrial Mastewater Discharge Permit was approved in the Districts' letter dated January 2, 1980. One of the requirements specified in the approval was the submittal of Critical Parameter (chamical analysis) Reports to the Districts according to the Frequency of Laboratory Analysis Form issued with the Permit.

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Very truly yours.

Walter E. Sarrison

Supervising Civil Engineer

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NOTE: You are reminded that the critical parameters are to be determined and the report forms submitted to the Districts according to the following schedule:

Annual Analysis -- July 1

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 Quarterly Analysis -- January 1, April 1, July 1, October 1

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